



Mitigated Negative Declaration

Pursuant to Title 14, Division 6, Chapter 3, Article 6, Sections 15070 and 15071 of the California Code of Regulations and pursuant to the Procedures for Preparation and Processing of Environmental Documents adopted by the County of Sacramento pursuant to Sacramento County Ordinance No. SCC-116, the Environmental Coordinator of Sacramento County, State of California, does prepare, make, declare, publish, and cause to be filed with the County Clerk of Sacramento County, State of California, this Mitigated Negative Declaration re: The Project described as follows:

1. Control Number: PLNP2024-00109

2. Title and Short Description of Project: 5204 Marione Dr WCF

The proposed project consists of the construction of a new 79-foot-tall Wireless Communication Facility (WCF) and accompanying equipment cabinet and 30KW backup generator.

3. Assessor's Parcel Number(s): 283-0242-003-0000

4. Location of Project: The proposed project is located at 5204 Marione Drive, approximately 555 feet northeast of the intersection of Arden Way and Fair Oaks Boulevard, in the Carmichael/Old Foothill Farms community of unincorporated Sacramento County.

5. Project Applicant:

6. Said project will not have a significant effect on the environment for the following reasons:

- a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
- b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
- c. It will not have impacts, which are individually limited, but cumulatively considerable.
- d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

7. As a result, thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.

8. The attached Initial Study has been prepared by the Sacramento County Planning and Environmental Review Division in support of this Mitigated Negative Declaration. Further information may be obtained by contacting the Planning and Environmental Review Division at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141

Julie Newton
Environmental Coordinator
County of Sacramento, State of California

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APPENDICES

Appendix A: HELIX Environmental Planning, Inc., Marione Drive Cell Tower Project Arborist Report, October 2024.

Appendix B: ISE, Inc., Glen Hunt III, MS, PE, Principal Engineer, Structural Analysis Letter, May 24, 2024.

Appendix C: Waterford Consultants, LLC, Radio Frequency Emissions Compliance Report, prepared by David C. Cotton, Registered Professional Engineer (PE), January 30, 2024.

Due to the length, Appendix A, B, and C are available to view at Sacramento County Planning and Environmental Review, 827 7th Street Room 225, Sacramento, CA 95814 during normal business hours, or online at <http://planningdocuments.saccounty.gov>

The direct link is:

<https://planningdocuments.saccounty.gov/ViewProjectDetails.aspx?ControlNum=PLNP2024-00109>

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

PROJECT TITLE: 5204 Marione Dr WCF

CONTROL NUMBER: PLNP2024-00109

LEAD AGENCY: County of Sacramento
827 7th Street, Room 225
Sacramento, CA 95814

PROJECT SPONSOR: 51 Wireless, LLC
4930 Pacific Street
Rocklin, CA 95677
Nick Tagas

LOCATION: The proposed project is located at 5204 Marione Drive, approximately 555 feet northeast of the intersection of Arden Way and Fair Oaks Boulevard, in the Carmichael/Old Foothill Farms community of unincorporated Sacramento County.

ASSESSOR'S PARCEL NUMBER: 283-0242-003-0000

GENERAL PLAN DESIGNATION: LDR – Low Density Residential

ZONING: RD 2 – Low Density Single-Family Residential

PROJECT DESCRIPTION

The proposed project consists of the construction of a new 79-foot-tall mono-pine stealth design Wireless Communication Facility (WCF) and at the base of the WCF, accompanying equipment cabinet and 30KW backup generator, all within a lease area of about 576 square feet. The WCF is designed to accommodate future wireless tenant collocations. The lease area is located in the southwest corner of the property. The site is proposed to be accessed from a new driveway from Marione Drive from the north side of the lot.

The project consists of the following entitlements:

1. A **Use Permit** to allow a new Wireless Communication Facility (WCF) in the Residential Density – 2 Acres (RD-2) zoning district.
2. A **Special Development Permit** to allow the proposed project to deviate from the following development standards:

- Maximum Height (Section 3.6.7.A, Table 3.6.2): Maximum height allowed for a new Group 1 WCF is 55 feet. As proposed, the wireless communication tower would be 79 feet.
 - Separation- Group 1 Zone Property– Minimum (Section 3.6.7.A, Table 3.6.2): Three times height of tower, for this project this would be 237 feet. As proposed the separation from Group 1 zoned properties would be 17 feet from the southern property line and 68.7 feet from the eastern property line.
3. A **Design Review** to determine substantial compliance with the *Sacramento County Countywide Design Guidelines* (Design Guidelines).

SURROUNDING LAND USES AND SETTING

The proposed project site is located at 5204 Marione Drive and is currently a vacant 0.73-acre lot. The proposed project site is zoned Residential Density – 2 Acres (RD-2), and surrounding uses are single family residential zoned RD-2 to the north and east, multi-tenant retail commercial zoned LC to the west, and an apartment complex zoned RD-20 to the south (See Plate IS-2).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

None required.

Plate IS-1: 5204 Marione Dr WCF Site Map

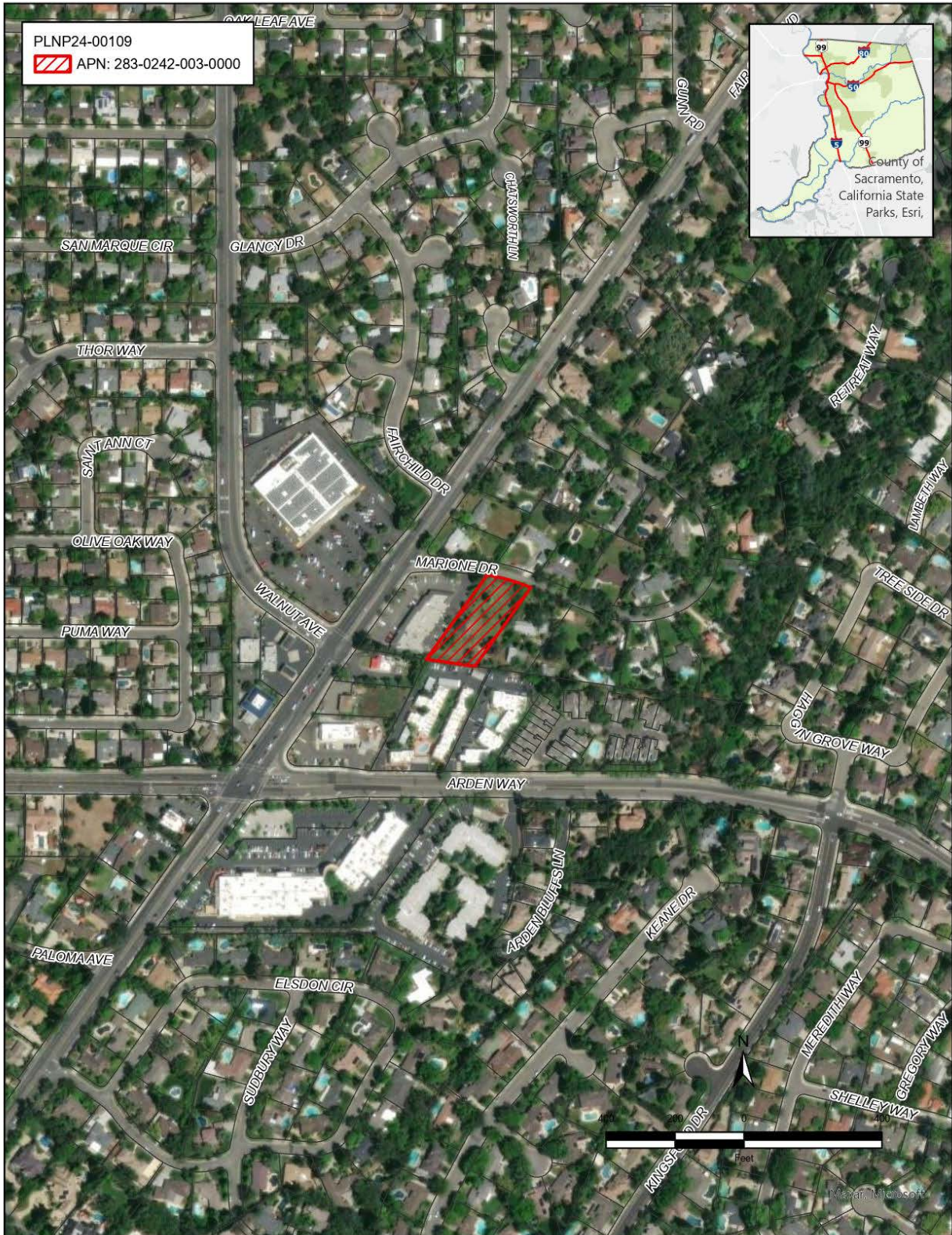


Plate IS-2: 5204 Marione Dr WCF Zoning Map

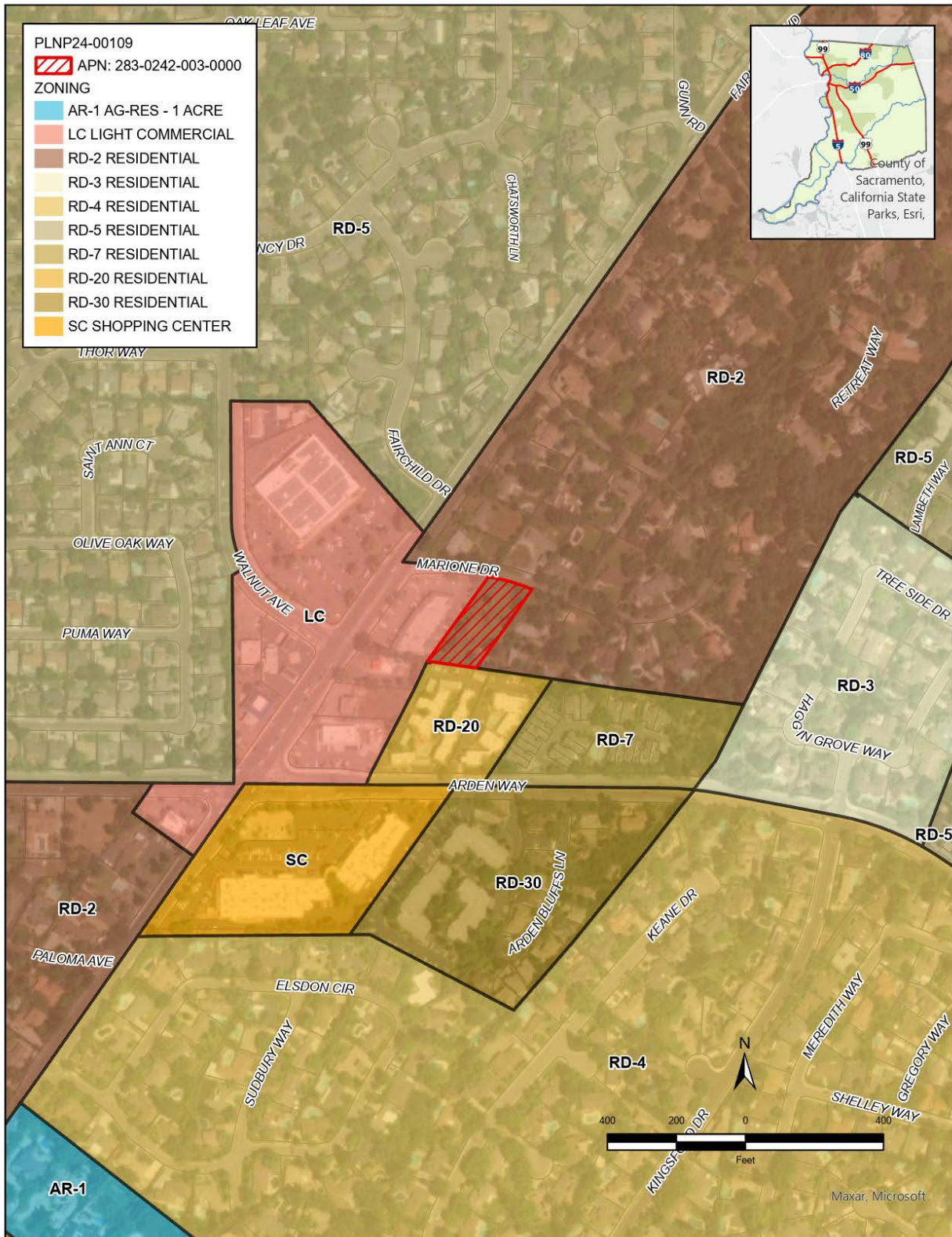
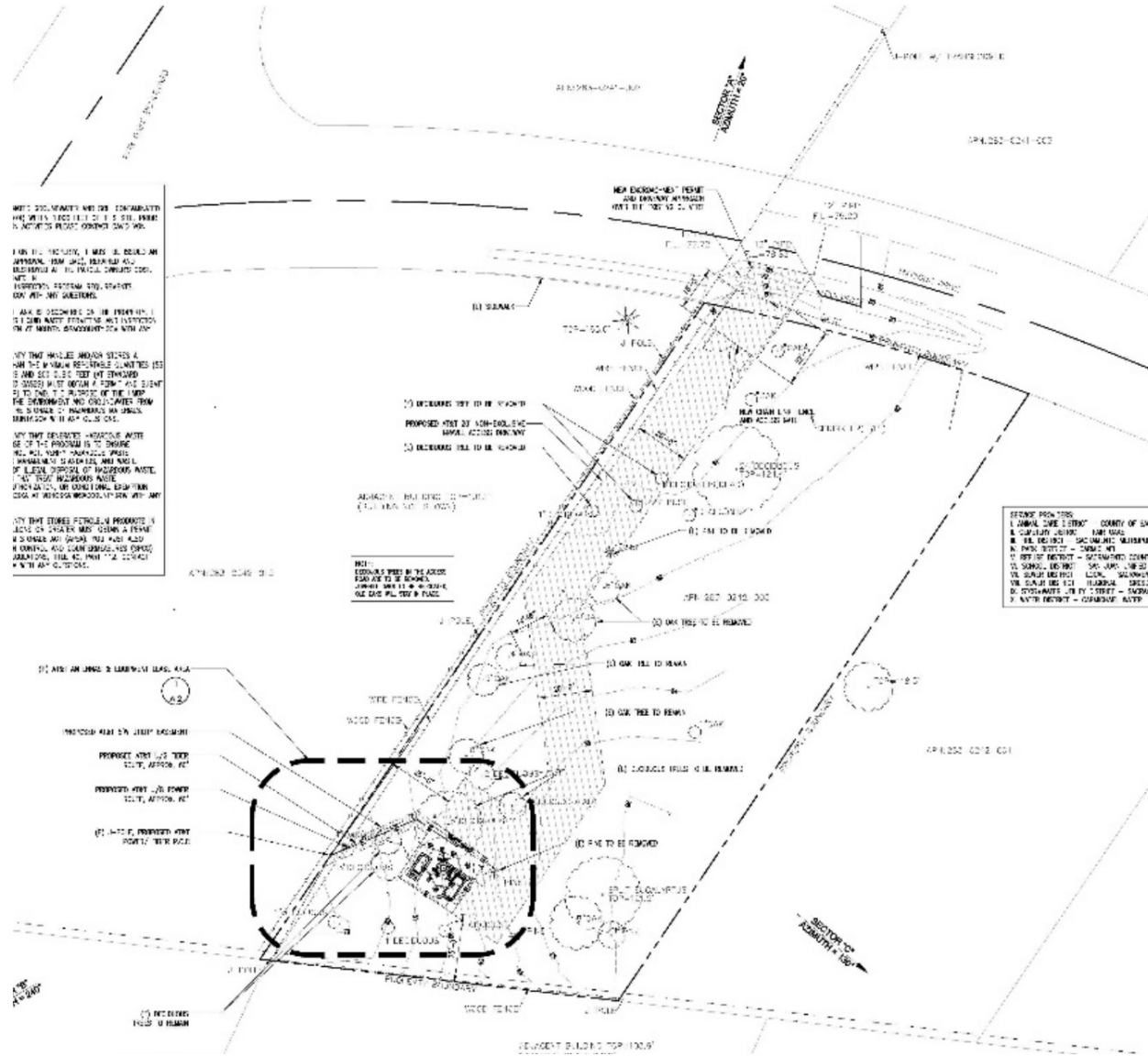


Plate IS-3: 5204 Marione Dr WCF Site Plan



NOT: THE PROPERTY OWNER SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE LOCAL GOVERNMENT AND AGENCIES. THE OWNER SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE LOCAL GOVERNMENT AND AGENCIES. THE OWNER SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE LOCAL GOVERNMENT AND AGENCIES.

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SECTOR OF JURISDICTION: COUNTY OF LAKE CHARLES, LOUISIANA. PARISH OF CALIBOUSSA, LOUISIANA. DISTRICT OF CALIBOUSSA, LOUISIANA. DISTRICT OF CALIBOUSSA, LOUISIANA. DISTRICT OF CALIBOUSSA, LOUISIANA. DISTRICT OF CALIBOUSSA, LOUISIANA.

ENVIRONMENTAL CHECKLIST

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed the following Initial Study Checklist. The Checklist identifies a range of potential significant effects by topical area. The words "significant" and "significance" used throughout the following checklist are related to impacts as defined by the California Environmental Quality Act as follows:

1. **Potentially Significant** indicates there is substantial evidence that an effect MAY be significant. If there are one or more "Potentially Significant" entries an Environmental Impact Report (EIR) is required. Further research of a potentially significant impact may reveal that the impact is less than significant or less than significant with mitigation.
2. **Less than Significant with Mitigation** applies where an impact could be significant but specific mitigation has been identified that reduces the impact to a less than significant level.
3. **Less than Significant** indicates that a project will have an impact, but the impact is considered minor.
4. **No Impact** indicates that a project does not impact the particular resource.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation" as indicated by the checklist on the following pages.

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Airports |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emission |
| <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire |

I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views ¹ of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Notes: ¹ Public views are those that are experienced from a publicly accessible vantage point.				

ENVIRONMENTAL SETTING

The proposed project is located within the urbanized Carmichael/Old Foothill Farms community. The proposed project site is an undeveloped residential lot. The current viewshed is a developed landscape featuring large mature trees, utility power lines and poles, streetlights, residential dwellings and accessory structures (such as sheds) and commercial buildings.

REGULATORY SETTING

SACRAMENTO COUNTY ZONING CODE

Sacramento County Zoning Code Section 3.6.7 outlines WCF use standards and establishes the appropriate authority for approval. For the purposes of regulating WCFs, zoning districts are organized into three groups. The RD-2 zoning district is categorized as Group 1. A WCF in the O zoning district, or Group 1, is subject to the issuance of a Use Permit from the Planning Commission. Additionally, Zoning Code Section 3.6.7.A., Table 3.6.2 establishes WCF development standards, adopted primarily to address aesthetics. Pursuant to Section 6.4.6.A, deviations from development standards may be permitted with a Special Development Permit.

IMPACT DISCUSSION

a. *Would the project have a substantial adverse effect on a scenic vista?*

The project does not occur in the vicinity of any scenic highways, corridors, or vistas. Therefore, there is **no impact**.

- b. *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

The project is located in an urbanized area and does not contain scenic resources. **No impact** will occur.

- c. *Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The degree of impact of a project, either negative or beneficial, to the visual character of an area is largely subjective. Few objective or quantitative standards are available to analyze visual quality, and individual viewers respond differently to changes in the physical environment. Under CEQA, an evaluation of a project's potential visual change as viewed from private property is not required (*Mira Mar Mobile Community v. City of Oceanside*, 119 Cal.App.4th 477 [Cal. Ct. App. 2004]). Therefore, the analysis focuses on the potential of the project to substantially degrade visual character from public viewpoints, as a result of the request for deviations from the adopted standards outlined above.

The project complies with WCF development standards for separation setbacks from interior property boundaries and public right of way, and setbacks and screening for WCF ancillary equipment and enclosures. The project is requesting deviations through a Special Development Permit for the Group 1 maximum tower height and the minimum separation setback from Group 1 zoned property. The Group 1 maximum height tower requirement is 55 feet; the project request is 79± feet, a difference of 19± feet. The required separation setback from a Group 1 zoned property is three times the height of the tower. With the project height request at 79± feet, the required Group 1 separation distance would be 237± feet. As proposed, the WCF would be 17 feet from the southern property line and 69 feet from the eastern property line. This is a difference of 220± feet and 168± feet, respectively.

The proposed 79-foot tall WCF facility is proposed as a mono-pine stealth design tower with life-like branches for the concealment of the antennas. The WCF is sited towards the back of the 0.73-acre subject parcel. See Plate IS-3 for the site plan of where the proposed WCF will be located. The 79-foot-tall mono-pine WCF would be visible from the nearby residential and commercial properties, which include adjacent single-family residential homes, accessory dwelling units (ADUs), and commercial businesses. Photo simulations of the proposed WCF can be found in Plate IS-4 through Plate IS-13. Photo simulation views include looking south-southeast along Fairchild Drive Neighborhood, looking due south from Marione Drive, looking southeast from across Fair Oaks Boulevard (from the Raley's parking lot), looking east from Walnut Avenue, looking east-northeast from Fair Oaks Boulevard, looking northeast from Fair Oaks Boulevard at Arden Way, looking north from Arden Way, looking west along Marione Drive, and looking southwest from Marione Drive.

The nearest publicly visible location would be Marione Avenue. Marione Avenue is a one lane residential access road for the surrounding residential properties. Other nearby roadways where the WCF would be visible include Fair Oaks Boulevard, Walnut Avenue, Arden Way, and Fairchild Drive. The evergreen mono-pine stealth design tower has life-like branches for the concealment of the antennas, with the intent to "blend into the environment". Views of the WCF from vantage points south of the site will mostly be obstructed due to the tall, mature

trees surrounding the rear of the property. Furthermore, the lower portion of the WCF and equipment area will be behind a 6-foot-tall wooden fence.

The existing viewshed is a built environment consisting of large mature trees, utility power lines and poles, streetlights, home buildings, and sheds. The WCF will be concealed as an evergreen tree stealth design to blend in with the large mature trees surrounding the project site, especially from distances further away from the property, as illustrated in the photo simulations. Lower portions of the WCF and the equipment area will not be visible to surrounding properties or along Marione Drive and other surrounding roadways. The photo-simulations referenced above illustrate the before and after scenarios that would result from the project (including the requested deviations). The simulations show that while the WCF is visible in some locations, it does not significantly detract from the visual viewshed of the area. An abundance of mature trees softens the scale of the tower, and the existing above ground infrastructure (including telephone and electric lines) is indicative of the urban environment. The nature of the large subject lot (and surrounding lots) and existing vegetation provide additional visual screening. The Design Review Advisory Council (DRAC) found the project to be in substantial compliance with the Countywide Design Guidelines on January 23, 2025, and also noted that the stealthing was appropriate for the project and that the project blended well with the surrounding environment.

Therefore, the request for the special development permit to exceed the allowed height and deviate from the required zoning code setbacks, and in conjunction with the evergreen mono-pine design, the project would not conflict with regulations governing scenic quality, and impacts are ***less than significant***.

Plate IS-4: Aerial Viewpoints for Photo Simulations

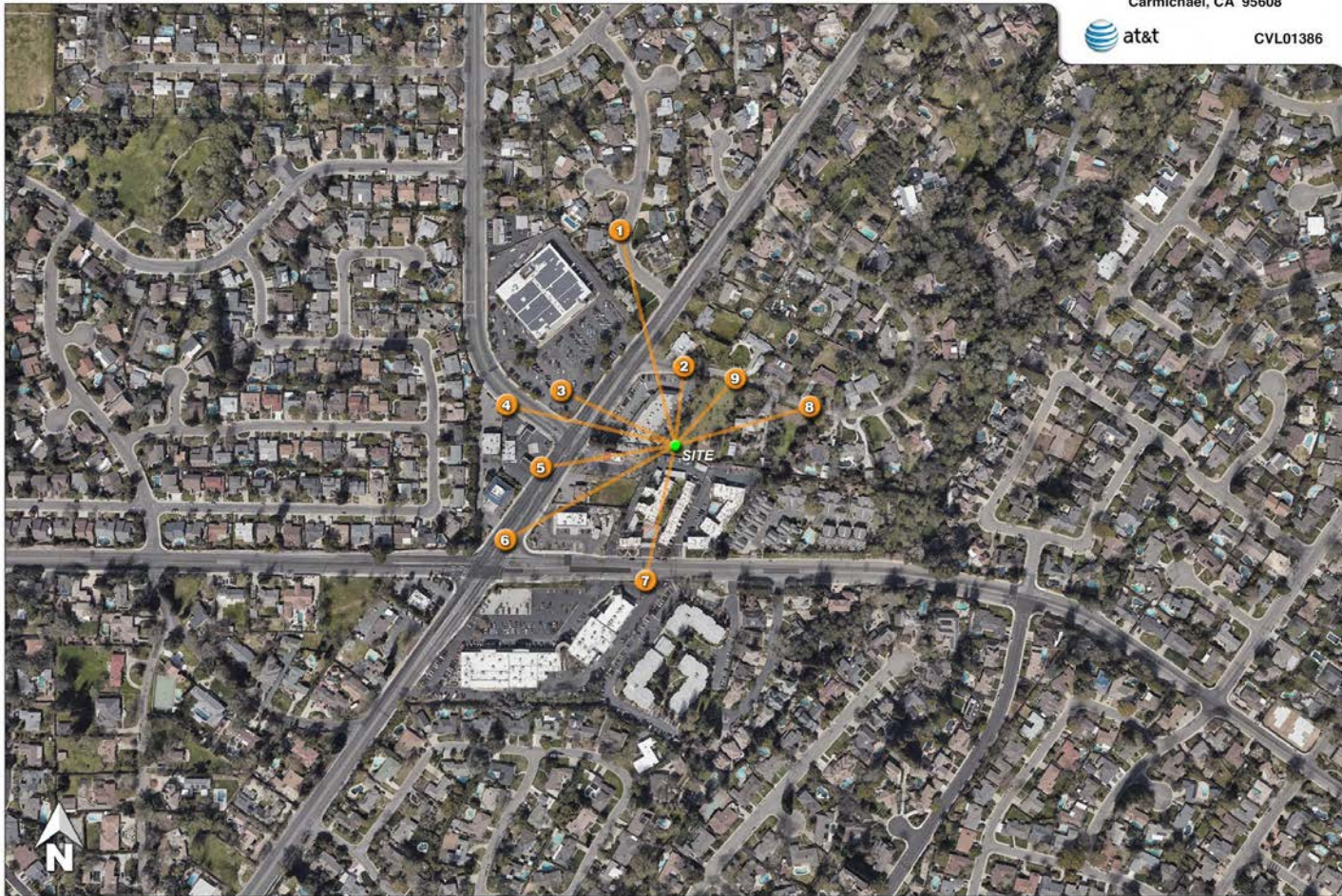
Version Date: October 28, 2024

Aerial photograph showing the viewpoints for the photosimulations.

Marione Drive
5204 Marione Drive
Carmichael, CA 95608



CVL01386



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Plate IS-5: Photo Simulation along Fairchild Drive Neighborhood

Version Date: October 28, 2024



Existing

Photosimulation of the view looking south-southeast from the Fairchild Drive neighborhood, 236 yards from the proposed monopine.

Marione Drive
5204 Marione Drive
Carmichael, CA 95608

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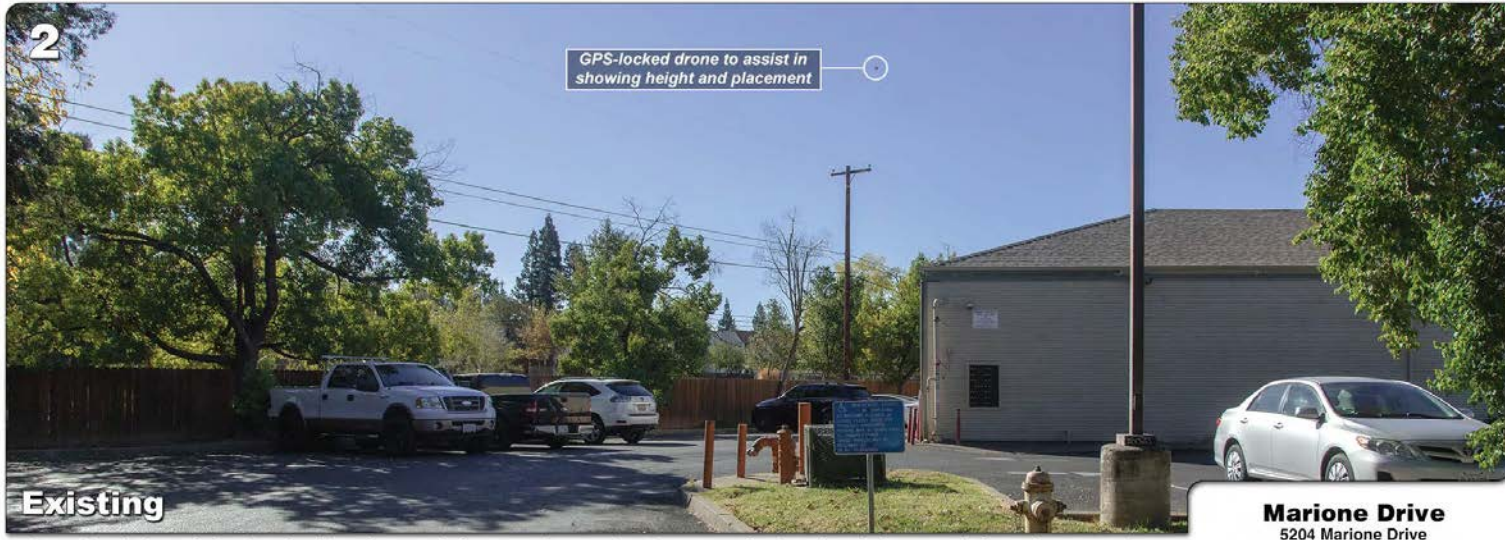


Proposed

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Plate IS-6: Photo Simulation South from Marione Drive

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Plate IS-7: Photo Simulation from Raley's Parking Lot

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Existing

Photosimulation of the view looking southeast from across Fair Oaks Blvd, in the Raley's parking lot, 133 yards from the monopine.

Marione Drive
5204 Marione Drive
Carmichael, CA 95608



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Proposed

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Plate IS-8: Photo Simulation from Walnut Avenue

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Photosimulation of the view looking east from Walnut Ave, approaching Fair Oaks Blvd, 166 yards from the proposed monopine.



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Plate IS-9: Photo Simulation along Fair Oaks Boulevard

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Photosimulation of the view looking east-northeast from Fair Oaks Blvd, just south of Walnut Ave, 125 yards from the monopine.

Marione Drive
5204 Marione Drive
Carmichael, CA 95608



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Plate IS-10: Photo Simulation at the Intersection of Fair Oaks Boulevard and Arden Way

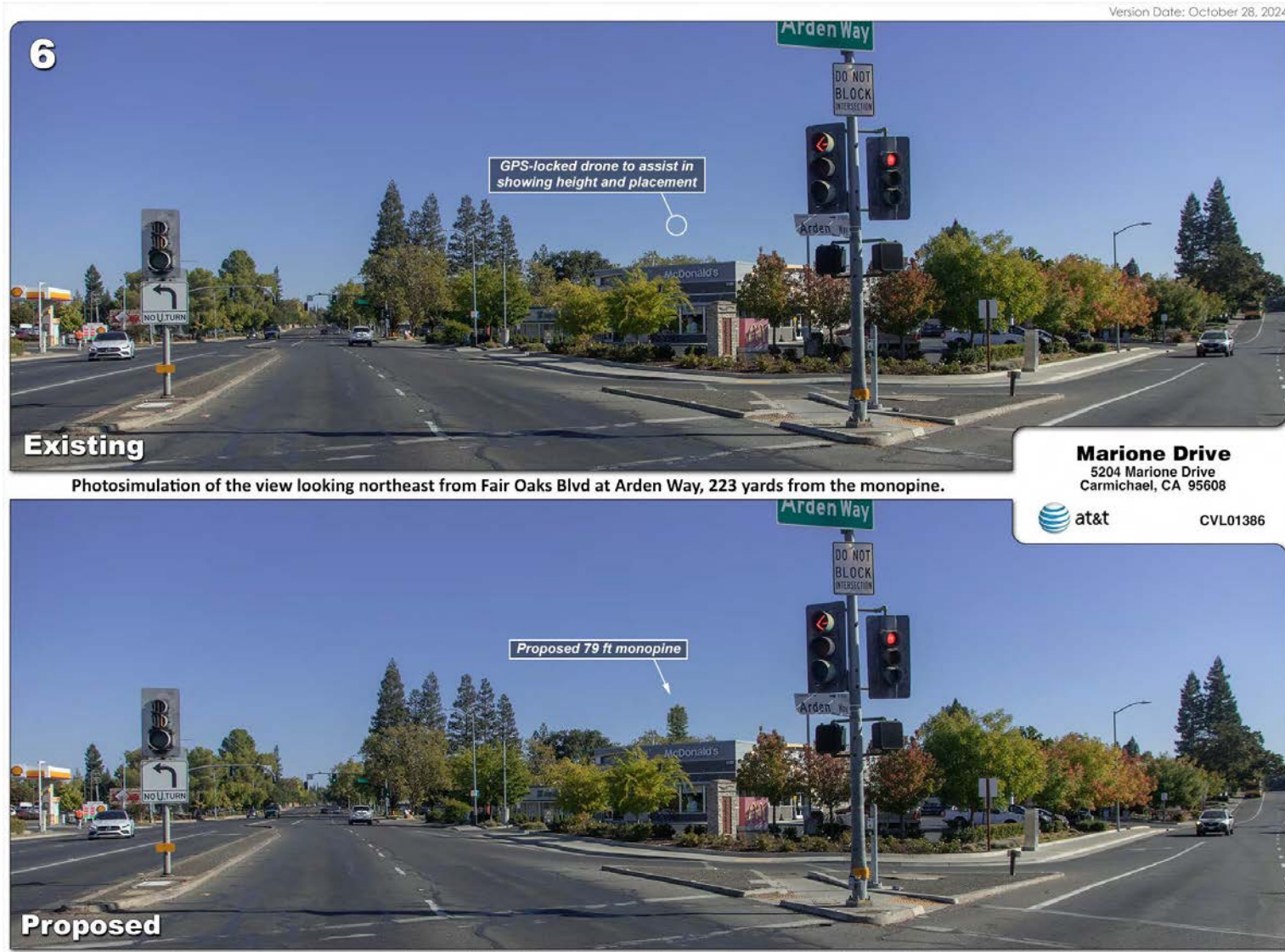


Plate IS-11: Photo Simulation along Arden Way

Version Date: October 28, 2024



Existing

Photosimulation of the view looking north from the nearest point along Arden Way, just east of Fair Oaks Blvd, 140 yards away.

Marione Drive
5204 Marione Drive
Carmichael, CA 95608



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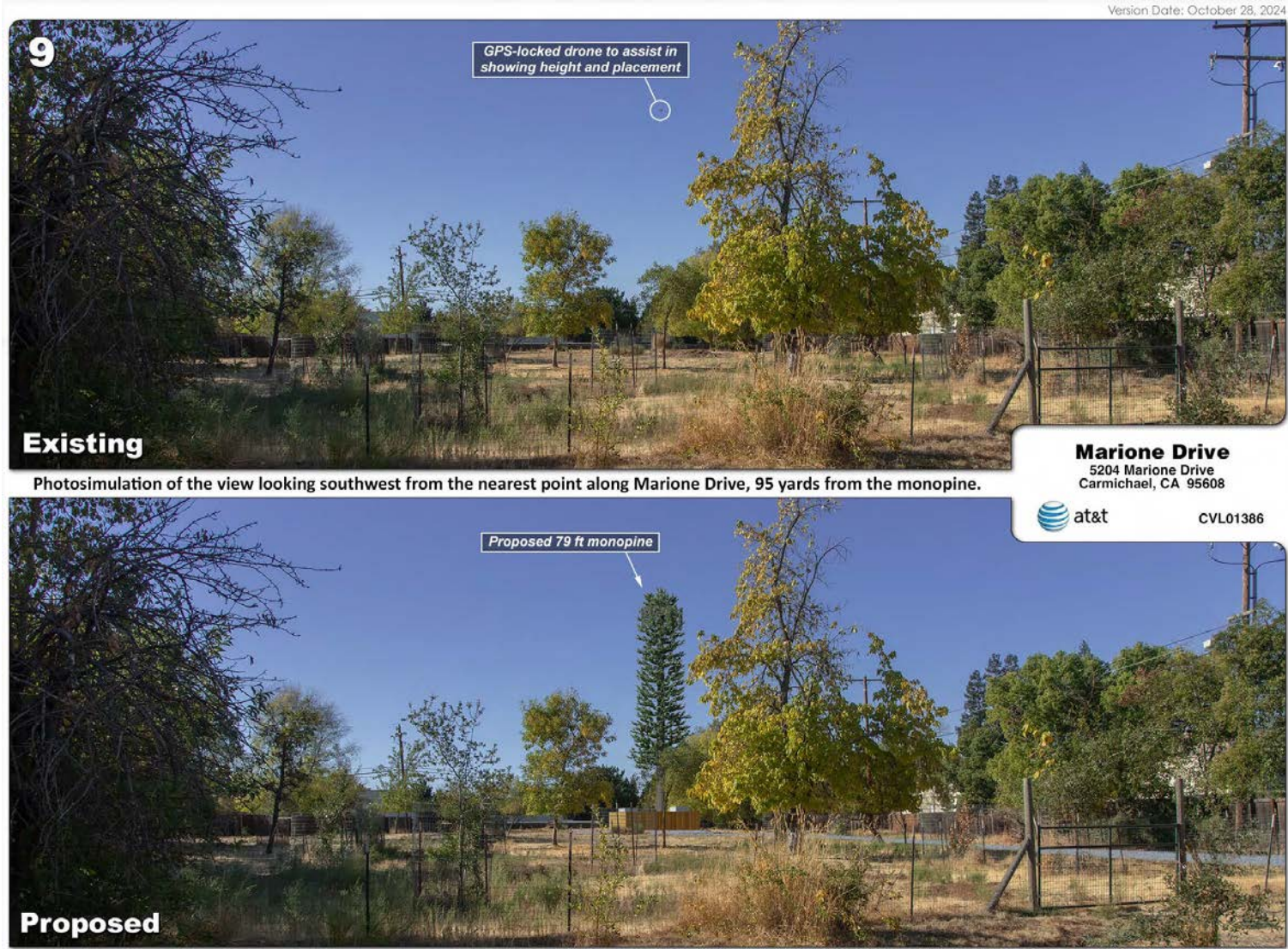
Proposed

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Plate IS-12: Photo Simulation West along Marione Drive



Plate IS-13: Photo Simulation Southwest along Marione Drive



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- d. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The facility will utilize outdoor security lighting. The lighting would not be directed beyond the WCF lease area, and the lighting and materials uses would be similar to lighting used in the adjacent commercial, single-family and multi-family developments. The proposed project would not be a new source of substantial light and would not create glare that would adversely affect day or nighttime views. Impacts would be ***less than significant***.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

II. AGRICULTURE AND FORESTRY RESOURCES

<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.</p>				
	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Introduce incompatible uses in the vicinity of existing agricultural uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project area is zoned for residential land use as it is in the RD-2 (Low Density Single-Family Residential) zoning district. The proposed project and the surrounding parcels are not zoned for agricultural use. The designated zoning classifications in the proposed project vicinity include SC (Shopping Center), RD-20 (High Density Multifamily Residential), RD-7 ((Low Density Single-Family Residential) and LC (Light Commercial).

IMPACT DISCUSSION

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

There are no lands designated as prime farmland, unique farmland, or farmland of statewide importance located with the proposed project vicinity. No conversion of Prime Farmland, Unique Farmland, or Farmland of State Importance would result from the proposed project. There would be **no impact**.

- b. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

There are no parcels zoned for agricultural use in the immediate or surrounding area of the proposed project. Nor are the immediate or surrounding regions of the proposed project enrolled in Williamson Act contracts. Therefore, there would be **no impact**.

- c. *Would the project introduce incompatible uses in the vicinity of existing agricultural uses?*

The proposed project site and its surrounding parcels are not zoned for agricultural use. There would be **no impact**.

- d. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Government Code Section 51104(g))?*

There are no land uses within or next to the proposed project site that are designated as forestland or timberland. Therefore, there would be **no impact**.

- e. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

The proposed project site and its surrounding area do not contain any designated forestland. Therefore, the project would not result in any loss of forestland or its conversion to non-forest uses. There would be **no impact**.

- f. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

The proposed project does not involve any changes or alterations to the existing environment that could result in the conversion of farmland to non-agricultural use or forestland to non-forest use, as no farmland or forestland exists in the immediate or surrounding area of the proposed project. Therefore, there would be **no impact**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

III. AIRPORTS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The proposed project is not in the vicinity of an airport or airstrip. The closest airport to the proposed project is Mather Field, located approximately 2.8 miles to the southeast.

IMPACT DISCUSSION

- a. *Would the project result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?*

The proposed project is not in the vicinity of an airport or airstrip and therefore would not result in a safety hazard for the people residing or working within its vicinity. There would be **no impact**.

- b. *Would the project expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?*

The proposed project is not in the vicinity of an airport or airstrip and therefore would not expose existing and new residents to substantial aircraft noise levels. There would be **no impact**.

- c. *Would the project result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?*

The proposed project is not in the vicinity of an airport or airstrip and therefore would not result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft. There would be **no impact**.

- d. *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

The proposed project is not in the vicinity of an airport or airstrip and therefore would not disrupt air traffic patterns. There would be **no impact**

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

IV. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.				
	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

Air quality in Sacramento County is regulated by several agencies, which include the U.S. Environmental Protection Agency (EPA), California Air Resources Board (ARB), and Sacramento Metropolitan Air Quality Management District (SMAQMD). Each of these agencies develops rules and/or regulations to attain the goals or directives imposed upon them through legislation.

The proposed project site is located in the Sacramento Valley Air Basin (SVAB). The SVAB's frequent temperature inversions result in a relatively stable atmosphere that increases the potential for pollution. Sacramento County is within the Sacramento Federal Nonattainment Area (SFNA) planning boundaries for ozone PM2.5 and PM10. The Federal and California Clean Air Acts require Air Quality Plans that consist of attainment plans and maintenance plans. Attainment plans must show how the region will attain an air pollutant standard by a certain date and maintenance plans must demonstrate how the region will continue to maintain compliance with a standard. The most recent State Implementation Plan for Ozone was adopted in September 2023.¹ The Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for ensuring that emission standards are not violated. Project related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation (Table IS-1).

Sacramento Metropolitan Air Quality Rules and Regulations

All projects are subject to SMAQMD Rules and Regulations in effect at the time of construction. A full list of the District's Rules and Regulations can be found online at their Rules & Regulations webpage at <https://www.airquality.org/Businesses/Rules-Regulations#09>. Examples of several

¹ <https://www.airquality.org/businesses/air-quality-plans>, retrieved 1/13/2025

SMAQMD Rules applicable to the proposed project include Rule 201 – General Permit Requirements, and Rule 403 – Fugitive Dust.

Because the Sacramento Valley Air Basin is in non-attainment for ozone, PM10 and PM2.5, the SMAQMD requires all projects implement the District's Basic Construction Emission Control Practices (also known as Best Management Practices – BMPs). Compliance and implementation of the BMPs allows for proposed projects to utilize the District's Significance Thresholds for construction and operational emissions, as shown in Table IS-2. Otherwise, without the BMPs, any emission above zero pounds per day would be considered significant and inconsistent with SMAQMDs air quality plans.

Table IS-1: Air Quality Standards Attainment Status

Pollutant	Attainment with State Standards	Attainment with Federal Standards
Ozone	Non-Attainment (1 hour Standard ¹ and 8 hour standard)	Non-Attainment, Classification = Severe - 15* (8 hour ³ Standards) Attainment (1 hour standard ²)
Particulate Matter 10 Micron	Non-Attainment (24 hour Standard and Annual Mean)	Attainment (24 hour standard)
Particulate Matter 2.5 Micron	Attainment (Annual Standard)	Non-Attainment (24 hour Standard) and Attainment (Annual)
Carbon Monoxide	Attainment (1 hour and 8 hour Standards)	Attainment (1 hour and 8 hour Standards)
Nitrogen Dioxide	Attainment (1 hour Standard and Annual)	Unclassified/Attainment (1 hour and Annual)
Sulfur Dioxide ⁴	Attainment (1 hour and 24 hour Standards)	Attainment/unclassifiable ⁵
Lead	Attainment (30 Day Standard)	Attainment (3-month rolling average)
Visibility Reducing Particles	Unclassified (8 hour Standard)	No Federal Standard
Sulfates	Attainment (24 hour Standard)	No Federal Standard
Hydrogen Sulfide	Unclassified (1 hour Standard)	No Federal Standard

1. Per Health and Safety Code (HSC) § 40921.59(c), the classification is based on 1989-1001 data, and therefore does not change.

2. Air Quality meets Federal 1-hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply. The SMAQMD attained the standard in 2009.

3. For the 1997, 2008 and the 2015 Standard.

4. Cannot be classified

5. Designation was made as part of EPA's designations for the 2010 SO₂ Primary National Ambient Air Quality Standard – Round 3 Designation in December 2017

* Designations based on information from <http://www.arb.ca.gov/desig/changes.htm#reports>

Source: SMAQMD. "Air Quality Pollutants and Standards". Web. Accessed: December 3, 2018. <http://airquality.org/air-quality-health/air-quality-pollutants-and-standards>

Table IS-2: SMAQMD Significance Thresholds

	ROG ¹ (lbs/day)	NO _x (lbs/day)	CO (µg/m ³)	PM ₁₀ (lbs/day)	PM _{2.5} (lbs/day)
Construction (short-term)	None	85	CAAQS ²	80 ^{3*}	82 ^{3*}
Operational (long-term)	65	65	CAAQS	80 ^{3*}	82 ^{3*}

1. Reactive Organic Gas
2. California Ambient Air Quality Standards
3*. Only applies to projects for which all feasible best available control technology (BACT) and best management practices (BMPs) have been applied. Projects that fail to apply all feasible BACT/BMPs must meet a significance threshold of 0 lbs/day.

SMAQMD has developed a screening level to assist in determining if both ozone precursors (NO_x) and particulate matter (PM_{2.5} and PM₁₀) emissions from constructing a project in Sacramento County will exceed SMAQMD's construction significance thresholds. The screening level was developed by the SMAQMD, using default construction inputs into the California Emissions Estimator Model (CalEEMod). Based on the modeling, projects that are 35 acres or less in size are generally considered to not exceed construction NO_x emissions.

Furthermore, construction projects that incorporate BMPs, do not exceed the screening level of 35 acres or more in size, and meets all the limitations listed below, will be considered to have a less than significant impact on air quality, as it relates to both ozone precursors (NO_x) and particulate matter (PM_{2.5} and PM₁₀). The limitations stipulate that the project cannot include any of the following:

- Include buildings more than four (4) stories tall;
- Include demolition activities;
- Include major trenching activities;
- Have a construction schedule that is unusually compact, fast-paced, or involve more than two phases (i.e., grading, paving, building construction and architectural coatings) occurring simultaneously;
- Involve cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills); and
- Require import or export of soil materials that will require a considerable amount of haul truck activity.

In regard to operational screening and long-term impacts, the SMAQMD significance threshold for NO_x is 65 lbs/day, while particulate matter (PM_{2.5} and PM₁₀) are 82³ lbs/day and 80³ lbs/day, respectively. This is summarized in Table IS-2: SMAQMD Significance Thresholds above.

*IMPACT DISCUSSION**a. Would the project conflict with or obstruct implementation of the applicable air quality plan?*

Regardless of a project's significance determination under CEQA, all projects must implement SMAQMD's Basic Construction Emission Control Practices (BMPs). Mitigation Measure AQ-1 has been incorporated to meet the BMP standards. Provided the proposed project implements the BMPs, the screening level described in the regulatory setting above can be used to determine if the project will exceed the SMAQMD significance threshold shown in Table IS-2.

Once a project is completed, additional pollutants are emitted through the use, or operation, of the site. Typically, a project must be comprised of large acreages or intense uses in order to result in significant operational air quality impact. The proposed project consists of an unmanned communication facility with a backup generator that runs once a month.

The project is below the SMAQMD screening criteria as the site is less than 35 acres and construction of the project does not involve buildings more than 4 stories tall; does not include demolition activities; there are no significant trenching activities; does not have an unusually compact construction schedule; there are no cut-and-fill operations; or import or export of soil materials requiring a considerable amount of haul truck activity. The project is therefore considered to be consistent with SMAQMD's air quality plans to attain federal and state ambient air quality standards. Mitigation consistent with the Basic Construction Emissions Control Practices have been included. Since the proposed project meets the Sacramento Metropolitan Air Quality Management District's screening criteria for PM₁₀ and PM_{2.5} and Ozone precursors, the proposed project will not conflict with adopted air quality plans. Impacts are **less than significant with mitigation**.

b. Would the project result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The project does not exceed the screening thresholds established by the Sacramento Metropolitan Air Quality Management District and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment (refer to the discussion in (a) above for more detail). Therefore, with mitigation outlined above, there is a **less than significant impact**.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

All criteria air pollutants can have human health effects at certain concentrations. Air districts develop region-specific CEQA thresholds of significance in consideration of existing air quality concentrations and attainment designations under the national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS). The NAAQS and CAAQS are informed by a wide range of scientific evidence, which demonstrates that there are known safe concentrations of criteria air pollutants. Because the NAAQS and CAAQS are based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of these standards, the thresholds established by air districts are also protective of human health. Sacramento County is currently in nonattainment of the NAAQS and CAAQS for ozone. Projects that emit criteria air pollutants in exceedance of

SMAQMD thresholds would contribute to the regional degradation of air quality that could result in adverse human health impacts.

While there would be emissions associated with the construction of the WCF these would be short term and with the mitigation discussed above would be less than significant. The project would not generate local emissions. Therefore, impacts of exposing sensitive receptors to substantial pollutant concentrations are ***less than significant***.

d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The project will not generate objectionable odors; therefore, there is ***no impact***.

ENVIRONMENTAL MITIGATION MEASURES

AQ-1: BASIC CONSTRUCTION EMISSIONS CONTROL PRACTICES

The following Basic Construction Emissions Control Practices are considered feasible for controlling fugitive dust from a construction site. The practices also serve as best management practices (BMPs), allowing the use of the non-zero particulate matter significance thresholds. Control of fugitive dust is required by District Rule 403 and enforced by District staff.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel-powered equipment. The California Air Resources Board (CARB) enforces idling limitations and compliance with diesel fleet regulations.

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1].

For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html.

- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic.

V. BIOLOGICAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Have a substantially adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Adversely affect or result in the removal of native or landmark trees?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with any local policies or ordinances protecting biological resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The proposed project area is surrounded by fragmented roads, suburban residential uses, and commercial uses and is subject to indirect effects from surrounding land uses. The American River is located approximately 0.6 miles east from the project site.

*REGULATORY SETTING***LOCAL REGULATIONS*****COUNTY OF SACRAMENTO GENERAL PLAN AND TREE ORDINANCE***

Sacramento County has identified the value of its native and landmark trees and has adopted measures for their preservation. The Tree Ordinance (Chapter 19.04 and 19.12 of the County Code) provides protections for landmark trees and heritage trees. The County Code defines a landmark tree as “an especially prominent or stately tree on any land in Sacramento County, including privately owned land” and a heritage tree as “native oak trees that are at or over 19” diameter at breast height (dbh).” Chapter 19.12 of the County Code, titled Tree Preservation and Protection, defines native oak trees as valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), blue oak (*Quercus douglasii*), or oracle oak (*Quercus morehus*) and states that “it shall be the policy of the County to preserve all trees possible through its development review process.” It should be noted that to be considered a tree, as opposed to a seedling or sapling, the tree must have a diameter at breast height (dbh) of at least 6 inches or, if it has multiple trunks of less than 6 inches each, a combined dbh of 10 inches.

The Sacramento County General Plan Conservation Element policies CO-138 and CO-139 also provide protections for native trees:

CO-138. Protect and preserve non-oak native trees along riparian areas if used by Swainson’s Hawk, as well as landmark and native oak trees measuring a minimum of 6 inches in diameter or 10 inches aggregate for multi-trunk trees at 4.5 feet above ground.

CO-139. Native trees other than oaks, which cannot be protected through development, shall be replaced with in-kind species in accordance with established tree planting specifications, the combined diameter of which shall equal the combined diameter of the trees removed.

Native trees other than oaks include Fremont cottonwood (*Populus fremontii*), California sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*), Oregon ash (*Fraxinus latifolia*), western redbud (*Cercis occidentalis*), gray pine (*Pinus sabiniana*), California white alder (*Alnus rhombifolia*), boxelder (*Acer negundo*), California buckeye (*Aesculus californica*), narrowleaf willow (*Salix exigua*), Gooding’s willow (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), shining willow (*Salix lucida*), Pacific willow (*Salix lasiandra*), and dusky willow (*Salix melanopsis*).

The Sacramento County General Plan Conservation Element contains several policies aimed at preserving tree canopies within the County. These are:

CO-137. Mitigate for the loss of native trees for road expansion and development consistent with General Plan policies and/or the County Tree Preservation Ordinance.

CO-145. Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the 15-year shade cover values for tree species.

CO-146. If new tree canopy cannot be created onsite to mitigate for the non-native tree canopy removed for new development, project proponents (including public agencies) shall contribute to the Greenprint funding in an amount proportional to the tree canopy of the specific project.

CO-147. Increase the number of trees planted within residential lots and within new and existing parking lots.

IMPACT DISCUSSION

- a. *Would the project have a substantially adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Review of the California Natural Diversity Database (CNDDDB) found that special status species reside along the American River, located approximately 0.6 miles east of the project site and none occur at the project site. The proposed project site is an undeveloped 0.73-acre parcel of land with limited tree coverage, situated adjacent to a commercial shopping center. The trees on the project site are not large enough to support nesting raptors, and no nests were observed. The site lacks habitat for special status species. Therefore, impacts are **less than significant**.

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The site does not contain any streams, ponds, or riparian habitat. The closest riparian habitat or other sensitive natural community is the American River, located approximately 0.6 miles east from the project site. Therefore, there would be **no impact**.

- c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The property has no signs of aquatic resources, including wetlands like vernal pools or seasonal wetlands, marshes, and streams. Therefore, there would be **no impact**.

- d. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Resident and/or migratory wildlife may be displaced by project construction; however, impacts are not anticipated to result in significant, long-term effects upon the movement of resident or migratory fish or wildlife species, and no major wildlife corridors would be affected. Therefore, impacts are **less than significant**.

- e. *Would the project adversely affect or result in the removal of native or landmark trees?*

ARBORIST REPORT

The applicant provided an Arborist Report and Tree Inventory Summary prepared by HELIX Environmental Planning, Inc. dated October 2024 (Appendix A). The Arborist Report identified the tree species, number of stems, diameter at breast height (dbh), average canopy (dripline radius), structure/vigor and overall health condition, dripline environment, and notable characteristics, including specific location of overhanging off-site trees. A total of 49 trees were inventoried and evaluated. There are 44 trees on site and five (5) trees overhanging off-site.

NON-NATIVE TREE IMPACTS

The report identified 35 non-native trees with five (5) of those trees overhanging off-site. There is no proposal for the removal of non-native, off-site trees. The applicant is proposing to remove seven (7) non-native trees located on the project site. The seven trees consist of various species of trees and do not meet the definition of a protected tree (either due to species or size). Six of the non-native trees identified range from a dbh of 1-2 inches, while one non-native tree has a dbh of 5 inches. The trees identified for removal do not comprise urban tree canopy due to their small size. Based on the staff conducted site visit, it was determined that the non-native trees would not contribute to a substantial tree canopy loss. Project impacts associated with the removal of non-native trees are ***less than significant***.

NATIVE TREE IMPACTS

The report identified 14 native trees, all of which are located onsite. Of the 14 native trees, six (6) are considered protected in accordance with the Sacramento County Tree Ordinance. The remaining 8 native trees have either a dbh of less than six inches for one trunk, or a diameter of less than ten aggregate inches for a multi-trunked native oak tree. The trees on-site range in conditions from poor to fair. PER staff conducted a site visit to verify report findings on January 9, 2025.

The proposed site plan currently includes building footprints for the unmanned communication facility and an access driveway. The applicant is proposing to remove one (1) native Valley oak tree located on the project site as a result of grading activities, placement of infrastructure, and construction of access driveway. The total diameter of the native oak tree is 8 inches.

The project site has five (5) native oak trees to remain. There are three (3) native oak trees that could be impacted from various construction-related activities. The trees consist of two (2) interior live oaks (*Quercus wislizeni*) and one (1) valley oak (*Quercus lobata*). They have been identified as trees 102, 111, and 112 in the arborist report (Attachment A). The other two trees are well outside the project footprint and would not be impacted from construction-related activities.

Consistent with County policy, Mitigation Measure BIO-1 requires replacement of native oak trees removed by planting in-kind native trees equivalent to the dbh inches lost and Mitigation Measure BIO-2 ensures the protection of native trees from construction-related impacts. Project impacts associated with the removal of protected native oak trees are ***less than significant with mitigation***

- f. *Would the project conflict with any local policies or ordinances protecting biological resources?*

With the implementation of Mitigation Measures BIO-1 and BIO-2, the project is consistent with local policies/ordinances protecting biological resources. The project site has a total of 49 trees, where 19 trees are native tree species, and the remaining 38 trees are non-native ornamental species. Mitigation Measures BIO-1 and BIO-2 ensure that the loss of urban benefit to the project site and surrounding parcels are addressed. Therefore, impacts are **less than significant**.

- g. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The proposed project site is not within a Habitat Conservation Plan and there are no known conflicts with any approved plan for the conservation of habitat. Therefore, there is **no impact**.

ENVIRONMENTAL MITIGATION MEASURES

BIO-1: NATIVE TREE REMOVAL

The removal of 8 inches dbh of native oak tree (#114) shall be compensated for by planting in-kind native trees equivalent to the dbh inches lost, based on the ratios listed below, at locations that are authorized by the Environmental Coordinator. On-site preservation of native trees that are less than 6 inches (<6 inches) dbh, may also be used to meet this compensation requirement. Native trees include: valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), blue oak (*Quercus douglasii*), or oracle oak (*Quercus morehus*), California sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*), Oregon ash (*Fraxinus latifolia*), western redbud (*Cercis occidentalis*), gray pine (*Pinus sabiniana*), California white alder (*Alnus rhombifolia*), boxelder (*Acer negundo*), California buckeye (*Aesculus californica*), narrowleaf willow (*Salix exigua*), Gooding's willow (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), shining willow (*Salix lucida*), Pacific willow (*Salix lasiandra*), and dusky willow (*Salix melanopsis*).

Replacement tree planting shall be completed prior to approval of grading or improvement plans, whichever comes first. A total of 8 inches will require compensation.

Equivalent compensation based on the following ratio is required:

- one preserved native tree < 6 inches dbh on-site = 1 inch dbh
- one D-pot seedling (40 cubic inches or larger) = 1 inch dbh
- one 15-gallon tree = 1 inch dbh
- one 24-inch box tree = 2 inches dbh
- one 36-inch box tree = 3 inches dbh

Prior to the approval of Improvement Plans or Building Permits, whichever occurs first, a Replacement Tree Planting Plan shall be prepared by a certified arborist or licensed landscape architect and shall be submitted to the Environmental Coordinator for approval. The Replacement Tree Planting Plan(s) shall include the following minimum elements:

1. Species, size and locations of all replacement plantings and < 6-inch dbh trees to be preserved
2. Method of irrigation
3. If planting in soils with a hardpan/duripan or claypan layer, include the Sacramento County Standard Tree Planting Detail L-1, including the 10-foot deep boring hole to provide for adequate drainage
4. Planting, irrigation, and maintenance schedules;
5. Identification of the maintenance entity and a written agreement with that entity to provide care and irrigation of the trees for a 3-year establishment period, and to replace any of the replacement trees which do not survive during that period.
6. Designation of 20-foot root zone radius and landscaping to occur within the radius of trees < 6 inches dbh to be preserved on-site.

No replacement tree shall be planted within 15 feet of the driplines of existing native trees or landmark size trees that are retained on-site, or within 15 feet of a building foundation or swimming pool excavation. The minimum spacing for replacement native trees shall be 20 feet on-center. Examples of acceptable planting locations are publicly owned lands, common areas, and landscaped frontages (with adequate spacing). Generally unacceptable locations are utility easements (PUE, sewer, storm drains), under overhead utility lines, private yards of single-family lots (including front yards), and roadway medians.

Native trees <6 inches dbh to be retained on-site shall have at least a 20-foot radius suitable root zone. The suitable root zone shall not have impermeable surfaces, turf/lawn, dense plantings, soil compaction, drainage conditions that create ponding (in the case of oak trees), utility easements, or other overstory tree(s) within 20 feet of the tree to be preserved. Trees to be retained shall be determined to be healthy and structurally sound for future growth, by an ISA Certified Arborist subject to Environmental Coordinator approval.

If tree replacement plantings are demonstrated to the satisfaction of the Environmental Coordinator to be infeasible for any or all trees removed, then compensation shall be through payment into the County Tree Preservation Fund. Payment shall be made at a rate of \$325.00 per dbh inch removed but not otherwise compensated, or at the prevailing rate at the time payment into the fund is made.

BIO-2: NATIVE TREE CONSTRUCTION PROTECTION

For the purpose of this mitigation measure, a native tree is defined as a valley oak (*Quercus lobata*) and interior live oak (*Quercus wislizeni*) having a diameter at breast height (dbh) of at least 6 inches, or if it has multiple trunks, a combined dbh of at least 10 inches.

With the exception of the trees removed and compensated for through Mitigation Measure BIO-1, above, all native trees (trees 102, 111, and 112 as identified in the arborist report) on the project site, shall be preserved and protected as follows:

1. A circle with a radius measurement from the trunk of the tree to the tip of its longest limb shall constitute the dripline protection area of the tree. Limbs must not be cut back in

order to change the dripline. The area beneath the dripline is a critical portion of the root zone and defines the minimum protected area of the tree. Removing limbs which make up the dripline does not change the protected area.

2. Chain link fencing or a similar protective barrier shall be installed one foot outside the driplines of the native trees prior to initiating project construction, in order to avoid damage to the trees and their root system.
3. No signs, ropes, cables (except cables which may be installed by a certified arborist to provide limb support) or any other items shall be attached to the native trees.
4. No vehicles, construction equipment, mobile home/office, supplies, materials or facilities shall be driven, parked, stockpiled or located within the driplines of the native trees.
5. Any soil disturbance (scraping, grading, trenching, and excavation) is to be avoided within the driplines of the native trees. Where this is necessary, an ISA Certified Arborist will provide specifications for this work, including methods for root pruning, backfill specifications and irrigation management guidelines.
6. All underground utilities and drain or irrigation lines shall be routed outside the driplines of native trees. Trenching within protected tree driplines is not permitted. If utility or irrigation lines must encroach upon the dripline, they should be tunneled or bored under the tree under the supervision of an ISA Certified Arborist.
7. If temporary haul or access roads must pass within the driplines of oak trees, a roadbed of six inches of mulch or gravel shall be created to protect the root zone. The roadbed shall be installed from outside of the dripline and while the soil is in a dry condition, if possible. The roadbed material shall be replenished as necessary to maintain a six-inch depth.
8. Drainage patterns on the site shall not be modified so that water collects or stands within, or is diverted across, the dripline of oak trees.
9. No sprinkler or irrigation system shall be installed in such a manner that it sprays water within the driplines of the oak trees.
10. Tree pruning that may be required for clearance during construction must be performed by an ISA Certified Arborist or Tree Worker and in accordance with the American National Standards Institute (ANSI) A300 pruning standards and the International Society of Arboriculture (ISA) "Tree Pruning Guidelines".
11. Landscaping beneath the oak trees may include non-plant materials such as boulders, decorative rock, wood chips, organic mulch, non-compacted decomposed granite, etc. Landscape materials shall be kept two (2) feet away from the base of the trunk. The only plant species which shall be planted within the driplines of the oak trees are those which are tolerant of the natural semi-arid environs of the trees. Limited drip irrigation approximately twice per summer is recommended for the understory plants.
12. Any fence/wall that will encroach into the dripline protection area of any protected tree shall be constructed using grade beam wall panels and posts or piers set no closer than 10 feet on center. Posts or piers shall be spaced in such a manner as to maximize the

separation between the tree trunks and the posts or piers in order to reduce impacts to the trees.

For a project constructing during the months of June, July, August, and September, deep water trees by using a soaker hose (or a garden hose set to a trickle) that slowly applies water to the soil until water has penetrated at least one foot in depth. Sprinklers may be used to water deeply by watering until water begins to run off, then waiting at least an hour or two to resume watering (provided that the sprinkler is not wetting the tree's trunk. Deep water every 2 weeks and suspend watering 2 weeks between rain events of 1inch or more.

VI. CULTURAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is located within the Carmichael/Old Foothill Farms community, approximately 0.6 miles west from the American River. It is an undeveloped parcel adjacent to a commercial lot and residential house.

IMPACT DISCUSSION

- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?*

The proposed project consists of the construction of an unmanned communication facility on an undeveloped parcel of land. The project site does not contain any historical resources. Therefore, there is **no impact**.

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*

The Northern California Information Center (NCIC) was consulted about the proposed project. A record search showed that the project site is not deemed sensitive for archaeological resources. However, it is still possible that archaeological resources exist on-site; therefore, mitigation has been recommended to address unanticipated discovery. Impacts are **less than significant with mitigation**.

- c. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

There are no known human remains on the project site. However, mitigation measures have been recommended to ensure proper handling if human remains are discovered during project implementation. Impacts are **less than significant with mitigation**.

*ENVIRONMENTAL MITIGATION MEASURES***CUL-1: CULTURAL RESOURCES UNANTICIPATED DISCOVERIES**

In the event that human remains are discovered in any location other than a dedicated cemetery, work shall be halted, and the County Coroner contacted. For all other potential tribal cultural resources [TCRs], archaeological, or cultural resources discovered during project's ground disturbing activities, work shall be halted until a qualified archaeologist and/or tribal representative may evaluate the resource.

1. **Unanticipated human remains.** Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop, and the County Coroner and the Planning and Environmental Review shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods.
2. **Unanticipated cultural resources.** In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained at the Applicant's expense to evaluate the significance of the find. If it is determined due to the types of deposits discovered that a Native American monitor is required, the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites as established by the Native American Heritage Commission shall be followed, and the monitor shall be retained at the Applicant's expense.
 - a) Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places or California Register of Historical Resources.
 - b) If a potentially eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review staff, and project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.

VII. ENERGY

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is located within the urbanized community of Carmichael/Old Foothill Farms. The project site is currently undeveloped and does not utilize energy. However, surrounding developments rely on energy for street and walkway lighting, as well as the operation of commercial buildings.

IMPACT DISCUSSION

- a. *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Energy will be consumed during the construction of the WCF, primarily in the form of fuel for construction workers traveling to and from the site and for the construction equipment. The project would not use an unusual number of workers and workers would be drawn from the local region. The construction equipment would use current fuel-efficient engines. Also, energy will be used to operate the WCF and to provide security lighting; however, the energy consumption will be similar to that of other WCFs and will not lead to wasteful, inefficient, or unnecessary energy use. Impacts would be **less than significant**.

- b. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Energy consumption for the construction and operation of the WCF would be consistent with that of other WCFs in the region; therefore, the project would not conflict with state or local plans. Impacts are **less than significant**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

VIII. GEOLOGY AND SOILS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is located on a nearly flat alluvial plain in the central Sacramento Valley. Sacramento County is not within the Alquist-Priolo Earthquake Fault Zone, or any other known faults. The nearest fault is the Willows Fault Zone, approximately 12 miles southwest of the project site.

According to the USDA Soil Survey (2018), the soil type of the proposed project area is Fiddymment-Urban land complex, 0 to 8 percent slopes. The composition of the soil consists of

approximately 70 percent Fiddymment and similar soils, 20 percent Urban land, and 10 percent minor components.

Urban land consists of areas covered by impervious surfaces or structures, such as roads, driveways, sidewalks, buildings, and parking lots. The soil material under the impervious surfaces is similar to that of Fiddymment soils, although it may have been truncated or otherwise altered.

The Fiddymment soil is moderately deep and well drained. It is formed in material weathered from consolidated sandstone or siltstone. Typically, the surface layer is brown fine sandy loam about 8 inches thick. The next layer is yellowish brown loam about 7 inches thick. The subsoil is a claypan of brown clay loam about 13 inches thick. The next 12 inches is a light yellowish brown and very pale brown hardpan that is cemented with silica. Siltstone is at a depth of about 40 inches. In some areas the surface layer is loam or sandy loam. Permeability is very slow in the Fiddymment soil. Water is perched above the claypan for short periods after heavy rainfall in winter and early spring and when the soil is overirrigated. Available water capacity is low. The effective rooting depth is 20 to 40 inches, but roots are restricted to the cracks and faces of peds in the claypan. The depth to a hardpan is 20 to 40 inches. The depth to consolidated sediments is 21 to 40 inches. The shrink-swell potential is moderate in the subsoil. Runoff is slow or medium. The hazard of water erosion is slight or moderate.

This combination of soil types is characterized as well drained with no frequency of flooding or ponding.

IMPACT DISCUSSION

a. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Sacramento County is not located within an Alquist-Priolo Earthquake Fault Zone. While there are no identified active earthquake faults in the project area, the site may still experience some ground shaking due to regional faults. The Uniform Building Code includes construction regulations for earthquake safety to ensure that impacts remain **less than significant**.

ii. *Strong seismic ground shaking?*

The project site is not within the close vicinity of a known earthquake fault and therefore would have **no impact**.

iii. *Seismic-related ground failure, including liquefaction?*

The project site is not located near any known earthquake faults and therefore would have **no impact**.

iv. *Landslides?*

There are no steep slopes at the project site or in the project vicinity where landslides could occur. Therefore, there would be **no impact**.

- b. *Would the project result in substantial soil erosion or the loss of topsoil?*

Compliance with the County's Land Grading and Erosion Control Ordinance (County Code Title 16, Chapter 16.44) will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction. Therefore, there would be a **less than significant impact**.

- c. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

The project soils are not unstable, nor would they become unstable as a result of the project. There is no potential for on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Therefore, there is **no impact**.

- d. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

The soils at the proposed WCF site are loam and clay, which are listed as having a moderate expansion potential. Pursuant to Title 16 of the Sacramento County Code and the Uniform Building Code, a soils report will be required prior to building construction. Potential for expansive soil conditions would be accounted for in the design and construction practices of the project; therefore, ensuring that impacts are **less than significant**.

- e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

The proposed project consists of the development of an unmanned communication facility that has no need for septic or wastewater connections. Therefore, there is **no impact**.

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

No known paleontological resources (e.g. fossil remains) or sites occur at the project location. Therefore, impacts would be **less than significant**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

IX. GREENHOUSE GAS EMISSIONS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Greenhouse gases (GHG), including CO₂, methane (CH₄), and nitrous oxide (N₂O), are naturally occurring atmospheric gases that insulate Earth as part of the greenhouse effect, which is responsible for keeping temperatures on Earth conducive to life. After solar radiation is absorbed by the earth’s surface, infrared radiation is emitted into the atmosphere, which is then absorbed by GHGs. Some of the infrared radiation is re-emitted back to the earth’s surface, warming the atmosphere. However, human activities such as combustion of fossil fuels have increasingly emitted excess GHGs into the atmosphere causing the greenhouse effect to intensify and Earth’s climate to warm at an unprecedented rate.

REGULATORY SETTING

California has adopted statewide legislation addressing various aspects of climate change and GHG emissions mitigation. Much of this establishes a broad framework for the State’s long-term GHG reduction and climate change adaptation program. Of particular importance is AB 32, which establishes a statewide goal to reduce GHG emissions back to 1990 levels by 2020, and Senate Bill (SB) 375 supports AB 32 through coordinated transportation and land use planning with the goal of more sustainable communities. SB 32 extends the State’s GHG policies and establishes a near-term GHG reduction goal of 40% below 1990 emissions levels by 2030. Executive Order (EO) S-03-05 identifies a longer-term goal for 2050.²

COUNTY OF SACRAMENTO CLIMATE ACTION PLANNING

The County’s Climate Action Plan (CAP), adopted by the Board of Supervisors in November 2024, is a comprehensive, multi objective plan that balances environmental, economic, and community interests for the reduction of GHG emissions. Strategies and measures have been identified in the CAP to meet California’s 2020 and 2045 GHG reduction targets. Each measure is supported by implementing actions to reduce GHG emissions generated from current and future activities within the unincorporated areas of the County, including existing County facilities and operations. Upon implementation of the CAP, projects being proposed in unincorporated areas of the County would need to demonstrate compliance with applicable measures and actions.

² EO S-03-05 has set forth a reduction target to reduce GHG emissions by 80 percent below 1990 levels by 2050. This target has not been legislatively adopted.

THRESHOLDS OF SIGNIFICANCE

Addressing GHG generation impacts requires an agency to make a determination as to what constitutes a significant impact. Governor's Office of Land Use and Climate Innovation (LCI) (formally Planning and Research (OPR's)) Guidance does not include a quantitative threshold of significance to use for assessing the proposed development's GHG emissions under CEQA. Moreover, CARB has not established such a threshold or recommended a method for setting a threshold for proposed development-level analysis.

In April 2020, SMAQMD adopted an update to their land development project operational GHG threshold, which requires a project to demonstrate consistency with CARB's 2017 Climate Change Scoping Plan. The Sacramento County Board of Supervisors adopted the updated GHG threshold in December 2020. SMAQMD's technical support document, "Greenhouse Gas Thresholds for Sacramento County", identifies operational measures that should be applied to a project to demonstrate consistency. These measures remain applicable for all projects until the CAP is implemented.

All projects must implement Tier 1 Best Management Practices to demonstrate consistency with the Climate Change Scoping Plan. After implementation of Tier 1 Best Management Practices, project emissions are compared to the operational land use screening levels table (equivalent to 1,100 metric tons of CO₂e per year). If a project's operational emissions are less than or equal to 1,100 metric tons of CO₂e per year after implementation of Tier 1 Best Management Practices, the project will result in a less than cumulatively considerable contribution and has no further action. Tier 1 Best Management Practices include:

- BMP 1 – no natural gas: projects shall be designed and constructed without natural gas infrastructure.
- BMP 2 – electric vehicle (EV) Ready: projects shall meet the current CalGreen Tier 2 standards.
 - EV Capable requires the installation of "raceway" (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s)
 - EV Ready requires all EV Capable improvements plus installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations

Projects that implement BMP 1 and BMP 2 can utilize the screening criteria for operation emissions outlined in Table IS-3. Projects that do not exceed 1,100 metric tons per year are then screened out of further requirements. For projects that exceed 1,100 metric tons per year, then compliance with BMP 3 is also required:

- BMP 3 – Reduce applicable project VMT by 15% residential and 15% worker relative to Sacramento County targets, and no net increase in retail VMT. In areas with above-average existing VMT, commit to provide electrical capacity for 100% electric vehicles.

SMAQMD's GHG construction and operational emissions thresholds for Sacramento County are shown in Table IS-3.

Table IS-3: SMAQMD Thresholds of Significance for Greenhouse Gases

Land Development and Construction Projects		
	Construction Phase	Operational Phase
Greenhouse Gas as CO ₂ e	1,100 metric tons per year	1,100 metric tons per year
Stationary Source Only		
	Construction Phase	Operational Phase
Greenhouse Gas as CO ₂ e	1,100 metric tons per year	10,000 metric tons per year

IMPACT DISCUSSION

- a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

The primary GHG emissions from construction related activities are a result of NO_x emissions. The project is within the screening criteria for construction related impacts related to air quality. The project site is less than 35 acres and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity. Basic Construction Emissions Control Practices have also been included as a mitigation measure with which the project must comply (Mitigation Measure AQ-1). The project meets the SMAQMD screening criteria for PM₁₀ and PM_{2.5} and Ozone precursors. Therefore, by being within the screening criteria for construction related impacts related to air quality, the GHG emissions from construction (Nox) are also within the screening criteria.

The project is an unmanned WCF which uses electrical power during normal operations and a backup battery system during power outages. No natural gas would be used and no EV charging would be required. As such the potential GHG emissions would be less than the SMAQMD threshold of 1,100 metric tons of CO₂e. The project will not have the potential to interfere with the County meeting the goals of AB 32 (reducing greenhouse gas emissions to 1990 levels by 2020); therefore, the climate change impact of the project is considered **less than significant**.

- b. *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The project is consistent with County policies adopted for the purpose of reducing the emission of greenhouse gases; therefore, there would be a **less than significant impact**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

X. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is located within the urbanized Carmicheal/Old Foothill Farms community. The proposed project is within the San Juan Unified School District. The closest school is Ralph Richardson Center, approximately 0.4 miles northwest. A review of available historical aerial imagery shows the project site as a vacant field since 1968 with no active cropland.

REGULATORY SETTING

Section 704 of the Telecommunications Act of 1996 (the "1996 Act") addresses federal, state and local government oversight of site selection for personal wireless service facilities such as towers for cellular, personal communication services, and specialized mobile radio transmitters. The 1996 Act states the following regarding a local government's jurisdiction pertaining to the environmental effects of radio frequency emissions (FCC, Wireless Telecommunications Bureau (1996), Fact Sheet #1 National Wireless Facilities Siting Policies, Washington, D.C.):

"No state or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the

environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions.”

On January 1, 1997, the new Guidelines adopted by the FCC (referred to as “the Commission” in the 1996 Act section cited above) went into effect. As discussed above, the new guidelines set a national RF exposure standard which is based on elements of both the 1992 revision of the ANSI/IEEE standard and the exposure criteria recommended by the National Council on Radiation Protection and Measurements. In addition, the updated guidelines are based on recommendations from those federal agencies responsible for health and safety, including the Environmental Protection Agency (EPA), the Center for Devices and Radiological Health (CDRH) of the Food and Drug Administration (FDA), the National Institute for Occupational Safety and Health (NIOSH) and the Occupational Safety and Health Administration (OSHA). The FCC has stated that the updated guidelines will ensure that the public and workers are adequately protected from exposure to potentially harmful RF emissions.

MICROWAVE EMISSIONS

PERSONAL WIRELESS SERVICE FACILITIES BACKGROUND

Three of the major types of personal wireless communication services currently in use are described below (information from the Federal Communications Commission (FCC) website at <https://www.fcc.gov/wireless/wireless-services>)

CELLULAR TELEPHONE SERVICE

Cellular telephone service is an extension of ordinary telephone services, except that it utilizes radio waves instead of wire to transmit and receive telephone calls. The cellular radiotelephone service is intended to provide customers with mobile telephone service over a broad geographic area. A cellular system operates by dividing a large geographic service area into cells and assigning the same frequencies to multiple, non-adjacent cells. This is known as “frequency reuse”. When a cellular subscriber makes or receives a call, the call is connected to the nearest cell site. As a subscriber travels within a cellular provider's service area, the cellular telephone call in progress is transferred, or “handed-off”, from one cell site to another without noticeable interruption. The smaller and more numerous a provider's cells are, the more it can reuse frequencies and the more users it can accommodate. In addition, all the cells in a cellular system are connected to a mobile telephone switching office (MTSO) by wireline (landline) or microwave links. The MTSO switches wireline-to-mobile and mobile-to-wireline calls between the public switched telephone network (PSTN) and the cell site. Cellular radio systems operate in the 824 – 849 MHz and 869 – 894 MHz frequency range, per FCC allocation.

PERSONAL COMMUNICATIONS SERVICES (PCS)

PCS encompasses two different licensed services offered over two different frequency bands, as well as certain unlicensed service. “Narrowband” PCS operates on frequencies in the 901 – 941 MHz range and is suitable for offering a variety of specialized services such as Messaging and two-way paging. “Broadband” PCS is similar to cellular radiotelephone service, except that PCS operates in a higher frequency band (1850 – 1990 MHz) which allows for a wider variety of communications services such as digital, voice, data and paging transmissions, over the same spectrum. Because PCS operates at a higher frequency than cellular service, PCS systems may require more antenna transmitters in the same geographic area.

WIRELESS COMMUNICATIONS SERVICE (WCS)

WCS may provide fixed, mobile, radiolocation or satellite communication services to individuals and businesses within their assigned spectrum block and geographical area. The WCS is capable of providing advanced wireless phone services which are able to pinpoint subscribers in any given locale. WCS is used to provide a variety of mobile services, including an entire family of new communication devices utilizing very small, lightweight, multi-function portable phones and advanced devices with two-way data capabilities. WCS systems are able to communicate with other telephone networks as well as with personal digital assistants, allowing subscribers to send and receive data and/or video messages without connection to a wire. By FCC allocation, WCS operates in one of two bands: 2305 – 2320 MHz and 2345 – 2360 MHz.

ELECTROMAGNETIC FIELDS (EMFs) AND SAFETY STANDARDS

The FCC published “A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance” (June 2, 2000, with subsequent updates, hereafter called RF Guide), the purpose of which is to ensure that the antenna facilities located in communities comply with the FCC’s limits for human exposure to radiofrequency (RF) electromagnetic fields. The RF Guide explains the science of RF and the electromagnetic spectrum, the exposure guidelines and rules, and explains the procedures for compliance. The FCC Office of Engineering and Technology has also published Bulletin 56 (and 65, an addendum) in 1999, which answers many common questions about RF and about exposure limits. The RF Guide and Bulletins 56 and 65 are incorporated by reference and are available for review at the Division of Planning and Environmental Review, 827 7th Street, Room 225, Sacramento or online at <http://www.fcc.gov/oet/rfsafety/>. The information below is based entirely upon the incorporated publications.

As discussed above, personal wireless service facilities utilize radio waves to transmit and receive telephone calls. Radio waves and microwaves are forms of electromagnetic energy that are collectively described by the term "radiofrequency" or "RF." RF emissions can be discussed in terms of "energy," "radiation" or "fields." Radiation is simply defined as the movement of energy through space in the form of waves or particles. Electromagnetic radiation is when both electric and magnetic energy move together. The term "electromagnetic field" is used to indicate the presence of electromagnetic energy at a specific location. Like any wave-related phenomenon, electromagnetic energy is described by a wavelength and a frequency. RF signals are transmitted over a wide range of frequencies. The frequency of an RF signal is expressed in terms of cycles per second, or “Hertz” (Hz).

The range of wavelengths and frequencies of electromagnetic radiation is known as the electromagnetic spectrum. The frequency of the wave corresponds to its energy: a high frequency wave has high energy. Waves with sufficient energy are “ionizing”, that is, they are capable of stripping electrons from atoms and molecules, which results in a fundamental alteration of the nature of those molecules. Only very high-frequency waves, such as X-rays and gamma rays, have sufficient energy to ionize atoms and molecules. At the low-frequency end of the electromagnetic spectrum are low-energy, non-ionizing waves such as radio waves and visible light. Radiation described as non-ionizing does not have sufficient energy to alter the nature of the atoms and molecules it encounters.

Electromagnetic energy is common in the environment, resulting from numerous human-made and natural sources. Human-made sources include electrical wiring, utility lines, appliances, computers, and television and radio broadcasts. Natural sources include the human body, the

earth's magnetic field, and visible light. Electric and magnetic fields produced by every-day electrical appliances, radio waves, and microwaves are low-energy – even visible light is higher energy than these sources. High-energy waves at the top of the spectrum are X-rays and gamma rays.

The rate at which an organism will absorb RF energy is specific to the type of organism – this is referred to as the specific absorption rate (SAR), defined as the power absorbed per mass of tissue (watts per kilogram). Therefore, standards for maximum safe exposure are set to limit the specific absorption rate (SAR) below a maximum permissible level as averaged over the human body. The absorption of this energy can result in thermal effects – that is, the energy produced causes heating of the tissues. At low-level RF radiation exposure, such as what is generated by appliances, cellular phones, and cellular towers, significant heating effects or health hazards are not observed.

To ensure that exposure remains well below safe limits, in August 1996 the Federal Communications Commission (FCC) adopted guidelines for evaluating the environmental effects of radio frequency emissions (FCC, (1996) Report and Order, ET Docket No. 93-62 Washington, D.C.). The guidelines effectively set a national radio frequency (RF) exposure standard based on elements of both the 1992 revision of the American National Standards Institute (ANSI) standard for RF exposure and the exposure criteria recommended by the National Council on Radiation Protection and Measurements (NCRP).

The 1996 FCC limits for maximum permissible exposure specifies two tiers of exposure criteria, one tier for “controlled environments” (usually involving occupational environments) and a second, more stringent tier for “uncontrolled environments” (usually involving the general public). The FCC limits set the allowable specific absorption rate (SAR) level from *localized* exposure (e.g., hand-held devices) at 1.6 watts per kilogram (W/kg) for the general public (uncontrolled environments), as averaged over 1 gram of tissue. The FCC recommended exposure limits for generalized exposure are summarized in Table 1 of Bulletin 56, which includes maximum power density levels for RF energy originating from communication sites (as well as other sources). The levels are determined based on continuous exposure, are dependent on the frequency which is transmitted from the site, and are usually expressed in milliwatts per square centimeter (mW/cm²).

Generally, personal wireless services such as cellular, PCS, and WCS transmit in a frequency range of 300 – 3000 MHz (megahertz). Power density limits for uncontrolled environments (i.e., general public) from transmitters in this range are calculated by dividing the frequency by 1500 (f/1500). Therefore, a facility transmitting at a frequency of 870 MHz would have a maximum recommended power density of 0.58 mW/cm². At frequencies of 1500 – 100,000MHz the maximum power density is set at 1.0 mW/cm².

On March 27, 2013, the Commission adopted a First Report and Order (First RF Report and Order), Further Notice of Proposed Rulemaking (2013 RF Further Notice), and Notice of Inquiry (2013 RF Inquiry) in this proceeding, [78 FR 33654](#), June 4, 2013. In the 2019 Second Report and Order, the Commission simplified the regulatory framework for determining compliance with the Commission's existing RF exposure limits by providing more efficient, practical, and consistent RF exposure exemption criteria, evaluation procedures, and mitigation measures to help ensure compliance with the RF exposure limits. In the 2019 Memorandum Opinion and Order, the Commission affirmed its decision in the First RF Report and Order to classify in its rules the pinna (outer ear) as an extremity for RF exposure compliance testing. In the 2019 Termination of Notice of Inquiry, the Commission terminated the 2013 RF Inquiry that sought comment on the efficacy and propriety of the Commission's existing guidelines and policies for limiting RF exposure to

humans, finding no appropriate basis for and thus declining to propose amendments to existing limits at this time.

IMPACT DISCUSSION

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

The proposed project would not transport, use, or dispose of hazardous materials. Therefore, there is **no impact**.

- b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

The project will not be using hazardous materials therefore there is no risk of upset that would release hazardous materials.

Communication towers are manufactured under rigid conditions and the design and required safety factors are specified in the Uniform Building Code. The pole fabrication process is subject to independent inspection. The tower and foundation designs will be engineered to meet or exceed all requirements of the Uniform Building Code. The codes take into account the various stress loads that could be placed on the tower structure by earthquake, winds, storms, and any other combinations of high stress factors. The safety factors involved in the manufacture of these poles and their installation results in a very large margin of safety.

Accredited by the American National Standards Institute (ANSI), a Standard entitled "Structural Standards for Antenna Supporting Structures and Antennas" has been established for the design, superstructure, and foundation of telecommunication towers. This standard is designated as ANSI/TIA-222, provisions F and G, and is the governing document for telecommunication towers in the United States. The development of the standard was sponsored by the *Telecommunication* Industry Association (TIA) subcommittee TR-14.7. The key aspects discussed in the document are: modernization of the design of new towers and existing towers, definition of wind and ice load, and applicable requirements in the case of seismic activity.

The applicant provided a certified structural letter of the proposed mono-pole, signed by Glen Hunt III, MS, PE, Principal Engineer (Appendix B). According to the letter, the "fall drop zone" (radius of tower failure) for the proposed project is estimated to be within a 60± foot radius of the tower center. The area that would be affected by potential pole collapse consists of the southwestern part of the subject property, which is an area of trees and lawn, and a portion of a neighboring parking lot. No residential structures occur within the potential fall zone of the tower.

Monopole failure has the potential to impact the existing trees/vegetation/fencing located in the area around the tower. However, as the monopole is an engineer-designed structure that will comply with the safety factors specified in the Uniform Building Code, monopole failure is considered extremely unlikely. Potential impacts as a result of monopole collapse are therefore considered **less than significant**.

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

There are no known significant biological effects associated with cellular facilities when they are operated at or below FCC-adopted standards. At this location, the site will be leased to AT&T Mobility which is proposing a 79' mono-pole that will accommodate twelve (12) 8' antennas, twelve (12) RRUs (remote radio units), 30KW backup generator, and associated electrical equipment.

The applicant provided a Radio Frequency Emissions Compliance Report prepared by David C. Cotton, Registered Professional Engineer (PE) of Waterford Consultants, LLC, which included an engineering statement confirming compliance with radiofrequency radiation exposure limits (Appendix C). Waterford Consultants, LLC performed predictive modeling, following the FCC requirements, for the proposed project. The report states that power density decreases significantly with distance from any antenna and that the panel-antennas to be employed at this site are highly directional by design and the orientation in azimuth and mounting elevation serves to reduce the potential to exceed MPE limits at any location other than directly in front of the antennas. For a person anywhere at ground, the maximum RF exposure level due to the proposed AT&T WCF operation, including the contribution of the microwave dish, is calculated to be 7% of the applicable public exposure limit. The maximum calculated level at the second-floor elevation of any nearby building is 29% of the public exposure limit. The modeling performed found that the potential RF exposures will be well below the general public limits for all publicly accessible areas at the project site and on nearby properties.

The report recommends RF Alerting Signage at the base of the tower and signage that restricts access to only authorized climbers that have completed RF safety training as required for occupational environmental compliance. To ensure worker safety and inform general public, mitigation requiring the RF Alerting Signage has been included. No significant environmental impacts related to EMF emissions are expected as a result of this project; impacts are ***less than significant***

- d. *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The proposed project site is not included on any list compiled pursuant to Section 65962.5 of the Government Code. Additionally, a search of the EnviroStor and GeoTracker databases was conducted, and no hazardous material records were located on site or in close proximity; therefore, there is ***no impact***.

- e. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The site is planned to be accessed through a new driveway from Marione Drive, on the northern side of the lot. This proposed driveway would allow emergency response access and would not impair implementation or physically interfere with emergency response. Therefore, impacts are ***less than significant***.

- f. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

The proposed project is within the urbanized Carmichael/Old Foothill Farms community. It would not expose people or structures to increase potential for wildfire. Therefore, impacts would be ***less than significant***.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XI. HYDROLOGY AND WATER QUALITY

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The Sacramento County Department of Water Resources Drainage Division is the main agency responsible for managing stormwater drainage and flood control in unincorporated Sacramento County, including the project area. Water supply is served by the Carmichael Water District. The existing drainage system within the project area consists of roadside drainages that allow water to flow into existing culverts, canals, and streams.

The project site is not located within a flood hazard zone. According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer, the project area is within Zone X, an area of minimal flood hazard or an area with reduced flood risk due to levee.

REGULATORY SETTING

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

Construction on undeveloped land exposes bare soil, which can be mobilized by rain or wind and displaced into waterways or become an air pollutant. Construction equipment can also track mud and dirt onto roadways, where rain will wash the sediment into storm drains and thence into surface waters. After construction is complete, various other pollutants generated by site use can also be washed into local waterways. These pollutants include vehicle fluids, heavy metals deposited by vehicles, and pesticides or fertilizers used in landscaping.

Sacramento County has a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit issued by the Regional Board. The Municipal Stormwater Permit requires the County to reduce pollutants in stormwater discharges to the maximum extent practicable. The County complies with this permit in part by developing and enforcing ordinances and requirements to reduce the discharge of sediments and other pollutants in runoff from newly developing and redeveloping areas of the County.

The County has established a Stormwater Ordinance (Sacramento County Code 15.12). The Stormwater Ordinance prohibits the discharge of unauthorized non-stormwater to the County's stormwater conveyance system and local creeks. It applies to all private and public projects in the County, regardless of size or land use type. In addition, Sacramento County Code 16.44 (Land Grading and Erosion Control) requires private construction sites disturbing one or more acres or moving 350 cubic yards or more of earthen material to obtain a grading permit. To obtain a grading permit, project proponents must prepare and submit for approval an Erosion and Sediment Control (ESC) Plan describing erosion and sediment control best management practices (BMPs) that will be implemented during construction to prevent sediment from leaving the site and entering the County's storm drain system or local receiving waters. Construction projects not subject to SCC 16.44 are subject to the Stormwater Ordinance (SCC 15.12) described above.

In addition to complying with the County's ordinances and requirements, construction sites disturbing one or more acres are required to comply with the State's General Stormwater Permit for Construction Activities. The General Permit requires preparation and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) that must be kept on site at all times for review by the State inspector. Although the County has no enforcement authority related to the Construction General Permit, the County is required by its Municipal Stormwater Permit to verify that SWPPPs include six minimum components.

During the wet season (October 1 – April 30), the project must include an effective combination of erosion, sediment and other pollution control BMPs in compliance with the County ordinances and the State's Construction General Permit. During the rest of the year, typically erosion controls are not required, except in the case of predicted rain.

Erosion controls should always be the first line of defense, to keep soil from being mobilized in wind and water. Examples include stabilized construction entrances, tackified mulch, 3-step hydroseeding, spray-on soil stabilizers and anchored blankets. Sediment controls are the second line of defense; they help to filter sediment out of runoff before it reaches the storm drains and

local waterways. Examples include rock bags to protect storm drain inlets, staked or weighted straw wattles/fiber rolls, and silt fences.

In addition to erosion and sediment controls, the project must have BMPs in place to keep other construction-related wastes and pollutants out of the storm drains. Such practices include, but are not limited to: filtering water from dewatering operations, providing proper washout areas for concrete trucks and stucco/paint contractors, containing wastes, managing portable toilets properly, and dry sweeping instead of washing down dirty pavement.

It is the responsibility of the project proponent to verify that the proposed BMPs for the project are appropriate for the unique site conditions, including topography, soil type and anticipated volumes of water entering and leaving the site during the construction phase. In particular, the project proponent should check for the presence of colloidal clay soils on the site. Experience has shown that these soils do not settle out with conventional sedimentation and filtration BMPs. The project proponent may wish to conduct settling column tests in addition to other soils testing on the site, to ascertain whether conventional BMPs will work for the project.

If sediment-laden or otherwise polluted runoff discharges from the construction site are found to impact the County's storm drain system and/or Waters of the State, the property owner will be subject to enforcement action and possible fines by the County and the Central Valley Regional Water Quality Control Board.

IMPACT DISCUSSION

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality. Therefore, the impact is **less than significant**.

- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The project is an unmanned communication facility located within an undeveloped commercial lot. The project will not use groundwater, and the proposed project site is not within a known groundwater recharge area. Therefore, there is **no impact**.

- c. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

- i. *result in a substantial erosion or siltation on- or off-site;*

The proposed project would not alter the course of a water body, nor would it alter the existing site drainage pattern. The site drainage is not expected to result in substantial on or off-site siltation or erosion. Therefore, there is **no impact**

- ii. *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*

The project does not involve any modifications that would substantially alter the existing drainage pattern and/or increase the rate or amount of surface runoff in a manner that would lead to flooding. Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are **less than significant**.

- iii. *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;*

The project site is an undeveloped commercial lot and the surrounding area is developed with drainage systems in place. The small increase of impermeable surface would not generate runoff that would exceed the capacity of the existing drainage system. Therefore, impacts would be **less than significant**.

- iv. *impede or redirect flood flows?*

The proposed project site is not within a floodplain or a local flood hazard area and would therefore not impede or redirect flood flows. Therefore, there is **no impact**.

- d. *Would the project develop in an area that is subject to 200-year urban levels of flood protection (ULOP)?*

The project is not located in an area subject to 200-year urban levels of flood protection (ULOP). Therefore, there is **no impact**.

- e. *Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

The proposed project site is not within a flood hazard zone. The Pacific Ocean is over 100 miles to the west; therefore, there would not be a risk of tsunami. There are no large bodies of water near the project site that would result in seiche hazards nor is the project region subjected to strong seismic ground shaking. Therefore, the proposed project would not risk the release of pollution due to project inundation and there would be **no impact**.

- f. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The proposed project would not conflict with or obstruct the implementation of the regional Basin Plan and therefore would have **no impact**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XII. LAND USE AND PLANNING

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project site falls within the boundaries of the Carmichael Community Plan. The project site is zoned Low Density Residential (RD-2), and the surrounding land uses are residential, light commercial, and shopping center. The unmanned communication facility would be located in the southwestern corner of the property, adjacent to a commercial parcel.

*IMPACT DISCUSSION**a. Would the project physically divide an established community?*

The proposed project would not divide an established community. The surrounding parcels are zoned as residential, light commercial, and shopping center. Therefore, there would be **no impact**.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The proposed project would not result in a significant environmental impact due to any conflicts with land use plans, policies, or regulations aimed at avoiding or mitigating environmental effects. Each topical section of the document contains specific policies related to the mitigation of environmental impacts, along with an analysis of their consistency with those policies. Therefore, there would be **no impact**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XIII. MINERAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The California Surface Mining and Reclamation Act (SMARA) requires the California Geological Survey to classify the regional significance of mineral resources and create mineral land classification reports. The proposed project site is located in an MRZ-1, classified as areas of no mineral significance. There are no mining operations within the proposed project's vicinity.

IMPACT DISCUSSION

- a. *Would the project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?*

The proposed project site is surrounded by urban development and is not classified as an area containing mineral resources. The proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Therefore, there would be **no impact**.

- b. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

There are no resource recovery sites delineated on any local government plan, specific plan, or land use plan. The proposed project is not located near a mineral resource recover site delineated by the General Plan or any other applicable land use plan. Therefore, there would be **no impact**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XIV. NOISE

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The current noise environment in the project area is mainly influenced by surface transportation noise from vehicular traffic on Fair Oaks Boulevard and Arden Way. Existing commercial uses near the proposed project site also contribute to the noise environment due to loading dock operations, vehicle movements in the parking lot, and verbal communications between consumers. Intermittent noise from the surrounding residential houses also contribute to the existing noise environment.

REGULATORY SETTING

SACRAMENTO COUNTY NOISE CONTROL ORDINANCE

The County's Noise Control Ordinance sets limits for exterior noise levels on some designated agricultural-residential and all residential properties. The Noise Ordinance does not apply to noise levels at agriculturally zoned properties. The standards found in the County's Noise Control Ordinance are based on the duration of noise on private property over one-hour periods. The ordinance is primarily concerned with regulating noise other than noise generated by transportation noise sources (e.g., passing cars or aircraft flyovers). The ordinance limits the duration of noise based on many factors, including the type of source, tonal characteristics of the source, ambient noise levels, time of day, etc., by utilizing a system of noise criteria not to be exceeded based on the duration of noise over any given hour. Construction noise is specifically exempted from the Noise Ordinance (Sacramento County Code Section 6.68). Table IS-4 summarizes the Noise Ordinance standards.

In recognition of ambient noise, the ordinance allows the standards set forth in Table IS-4 to be adjusted in 5 dBA increments to encompass the ambient noise level. For example, if the ambient noise level for a given hour was 57 dBA, the daytime L50 noise standard would be increased to 60 dBA. The Noise Control Ordinance also states that each of the standards identified in Table IS-4 should be reduced by 5 dBA for impulsive or simple tone noises, or for noises consisting of speech or music.

Table IS-4: Sacramento County Noise Ordinance

Cumulative Duration of the Intrusive Sound	Descriptor	Exterior Noise Standard, dB	
		Daytime (7am – 10pm)	Nighttime (10pm – 7am)
30 – 60 minutes per hour	L ₅₀	55	50
15 – 30 minutes per hour	L ₂₅	60	55
5 – 15 minutes per hour	L ₀₈	65	60
1 – 5 minutes per hour	L ₀₂	70	65
Level not to be exceeded at any time	L _{max}	75	70

Source: Sacramento County, Noise Control Ordinance. Chapter 6.68.070

IMPACT DISCUSSION

- a. *Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The project is not in the vicinity of any uses that generate substantial noise, nor will the completed project generate substantial noise. The proposed project requires a generator located behind a six-foot-tall wooden fence that would operate once a month for approximately an hour. The noise emitted from the generator would be equivalent to that of an idling delivery truck. A 2005 noise study was conducted by Bollard Acoustical Consultants, Inc., where the noise impacts of single idling trucks were evaluated. At a distance of 100 feet, there is an average noise level of 65 dB. Using the standard logarithmic scale for noise analysis, the projected noise level for the nearest residential community to the generator would be approximately 38 dB. The project noise level is below the Sacramento County outdoor noise level criteria. The nearest residential building is located approximately 125 feet southeast of the generator. The building consists of a multi-family apartment building with a surrounding parking lot and carports. The nearest common area of the apartment building is surrounded by apartment buildings and would directly absorb noise emissions from the generator.

Additionally, the Sacramento County Noise Ordinance [§6.68.090](#) exempts any mechanical device, apparatus, or equipment related to or connected with emergency work and backup purposes.

Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance [§6.68.090](#). Therefore, there is a **less than significant impact**.

- b. *Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?*

The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary. A **less than significant** impact will result.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XV. POPULATION AND HOUSING

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The proposed project site is located in the Carmichael/Old Foothill Farms Community and is designated as RD-2 (Low Density Single-Family Residential). The surrounding parcels are developed for residential and commercial use.

IMPACT DISCUSSION

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The project proposal is consistent with existing land use designations and will neither directly nor indirectly induce substantial unplanned population growth. A **less than significant** impact will result.

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project will not result in the removal of the existing houses and thus will not displace substantial amounts of existing housing. There will be no **impact**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XVI. PUBLIC SERVICES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The proposed project is located within the Carmichael/Old Foothill Farms community. It is served by the Sacramento Metropolitan Fire District (Sac Metro) and the Sacramento County Sheriff’s Department. The proposed project site would fall within the Twin Rivers Unified School District. Neighborhood and community parks are serviced by the Arcade Creek Park District.

IMPACT DISCUSSION

- a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection?

Although the proposed project would introduce an increased level of development within the Sac Metro service area, it would not require the construction of new physical structures or modifications to existing ones to maintain acceptable service ratios. Therefore, impacts are **less than significant**.

Police protection?

Although the proposed project would introduce an increased level of development with the Sheriff’s service area, it would not require the construction of new physical structures or

modifications to existing ones to uphold acceptable service ratios. Therefore, impacts are **less than significant**.

Schools?

The proposed facility is an unmanned WCF which would not generate any new students. Therefore, there is **no impact**.

Parks?

The proposed facility is an unmanned WCF which would not generate any new park users. Therefore, there is **no impact**.

Other public facilities?

The proposed facility is an unmanned WCF which would not generate any new users of library facilities. Therefore, there is **no impact**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XVII. RECREATION

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is within the urbanized area of the Carmichael/Old Foothill Farms community. The project is within the Arcade Creek Park District. There are three neighborhood and community parks within close vicinity to the project site: Arcade Creek Park (approximately 0.5 miles southeast), Jo Smith Nature Trail (approximately 0.5 miles southeast), and the Scandia Family Fun Center (approximately 0.9 miles west).

IMPACT DISCUSSION

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

The project is an unmanned WCF on an undeveloped commercial lot. No increase in use would result from the development of the project. Therefore, there is **no impact**.

- b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The project is an unmanned WCF on an undeveloped commercial lot. The proposed project would not require the construction or expansion of recreational facilities. Therefore, there is **no impact**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XVIII. TRANSPORTATION

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is located within the urbanized Carmichael/Old Foothill Farms community. The current access to the proposed unmanned communication facility is along the northeastern property border, adjacent to Marione Drive.

IMPACT DISCUSSION

- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

During the construction of the facility, there would be trips generated; however, these trips would be minor. As an unmanned communications facility, the operation of the project would not generate trips. Therefore, the project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation. Therefore, impacts are **less than significant**.

- b. *Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?*

The proposed project involves the development of an unmanned communications facility, which would not generate any trips beyond those associated with construction activities. Therefore, there is a **less than significant impact**.

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The proposed project does not add dangerous curves, introduce transportation facilities where there is inadequate site distance, or otherwise increases any hazards. Therefore, there is **no impact**.

d. *Would the project result in inadequate emergency access?*

The proposed access to the unmanned communication facility will be via a gravel driveway. Sac Metro has reviewed the proposal and submitted comments and conditions outlining fire access standards, which will be reviewed prior to improvement plans and building permits. Compliance with Sac Metro requirements will ensure that the project would not result in inadequate emergency access and would have **no impact**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XIX. TRIBAL CULTURAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project: a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The proposed project site region is known as the ethnographic-period territory of the Nisenan, also known as the Southern Maidu. The Nisenan maintained permanent settlement along major rivers in the Sacramento Valley and foothills. The proposed project is located 0.6 miles east of the American River. A review of available historical aerial imagery shows the project site as a vacant field since 1968 with no active cropland.

REGULATORY SETTING

Under PRC Section 21084.3, public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources (21080.3.1(a)).

In accordance with Assembly Bill (AB) 52, codified as Section 21080.3.1 of CEQA, formal notification letters were sent to those tribes who had previously requested to be notified of Sacramento County projects. A request for consultation was not received by the tribes.

IMPACT DISCUSSION

a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural*

landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Sacred Lands File Search (SLFS) request to the Native American Heritage Commission (NAHC). On January 14, 2025, the NAHC responded that there was a positive SLFS for the project site (Appendix D). The possibility of sub-surface tribal cultural resources (TCRs) is considered moderate and therefore, unanticipated discoveries mitigation (Mitigation Measure CUL-1) is recommended, and the impact is **less than significant impact with mitigation**.

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

The SLFS determined that there is a possibility of tribal cultural resources in the vicinity of the project site; however, no tribes requested consultations for this project. Mitigation Measure CUL-1 will ensure proper evaluation and management of unanticipated discoveries of potential TCRs, archaeological, or cultural resources that may occur during the project's ground-disturbing activities. Therefore, there is a **less than significant impact with mitigation**

ENVIRONMENTAL MITIGATION MEASURES

IMPLEMENT MITIGATION MEASURE CUL-1.

For the text of this mitigation measure, see the discussion of CUL-1 in section VI. *Cultural Resources – Unanticipated Discoveries*.

XX. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL SETTING

Within the proposed project area, there are different agencies that provide utility services to the community. The Sacramento Suburban Water District provides the primary water service. Sacramento Area Sewer District (SacSewer) provides wastewater conveyance and treatment services to the residential, industrial, and commercial customers within the proposed project area. Sacramento County Department of Water Resources (DWR) is responsible for drainage operations and maintenance. The Sacramento Municipal Utility District (SMUD) is the primary provider of electric service. These utilities do not have any current issues in providing service to the project site and its surrounding areas.

IMPACT DISCUSSION

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

The project would not require any water service, or wastewater service/treatment as the project is an unmanned communications facility. The project will require electrical power for operations; however, the amount of power required is within the service currently provided and would not require the construction or relocation of new facilities. The project would not generate solid waste. Therefore, impacts would be **less than significant**.

- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

The project is an unmanned communications facility and does not require water service. Therefore, there is **no impact**.

- c. *Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

The project is an unmanned communications facility and does not require wastewater treatment. Therefore, there is **no impact**.

- d. *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

The project is an unmanned communications facility and does not generate solid waste. Therefore, there is **no impact**.

- e. *Would the project result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?*

The project is an unmanned WCF which would connect into the existing storm water drainage facilities located within existing roadways and other developed areas. No significant new impacts would result from stormwater facility extension. Therefore, there would be a **less than significant impact**.

- f. *Would the project result in substantial adverse physical impacts associated with the provision of electric or natural gas service?*

The project would not use natural gas, and the amount of electricity used would not result in substantial adverse physical impact. Therefore, impacts would be **less than significant**.

- g. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The project is an unmanned communications facility and does not generate solid waste. Therefore, there is **no impact**.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XXI. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

The project site is located within the urbanized area of Carmichael/Old Foothills community and is managed by the Sacramento Metropolitan Fire District (Sac Metro). The project site is not within a designated high fire hazard severity zone or state responsible areas (SRAs) set forth by the California Department of Forestry and Fire Protection (CAL FIRE).

IMPACT DISCUSSION

- a. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The project site is not in a very high or high fire hazard severity zone and would not impair the emergency response plan or evacuation plan. Therefore, there would be **no impact**.

- b. *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

The project is not within SRAs or a very high or high severity zone. Development of the unmanned communication tower would not increase the existing fire hazard, which is very low due to the developed nature of the surrounding project area. The WCF would continue to be served by existing Sac Metro fire stations; therefore, there would be **no impact**.

- c. *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The project is the development of an unmanned communications facility. The project is well outside of any state responsibility area, or an area classified as very high fire hazard severity zone. It would not exacerbate fire risk or require installation of associated infrastructures. Therefore, the impact is ***less than significant***.

- d. *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The project is the development of an unmanned communications facility. The project is well outside of any state responsibility area, or an area classified as very high fire hazard severity zone. Therefore, impacts would be ***less than significant***.

ENVIRONMENTAL MITIGATION MEASURES

No mitigation required.

XXII. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IMPACT DISCUSSION

- a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

As discussed in Section V (Biological Resources) potential impacts were identified as the removal of one native Valley oak tree. These impacts will be mitigated to a **less than significant** level.

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

No past, present, or foreseeable future projects in the vicinity of the project area have been identified that would combine with the project to cause cumulative impacts. The proposed project is an unmanned communication facility where there are potential impacts to air quality, biological resources and cultural resources. These impacts have been mitigated to **less than**

significance and do not represent incremental effects that would be cumulatively considerable.

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

No substantial adverse effects, either directly or indirectly affecting human beings, were identified. Therefore, there is a **less than significant impact**.

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures AQ-1, BIO-1, BIO-2, and CUL-1 ensure that identified significant impacts of the project are reduced to a level of less than significant. Pursuant to Section 15074.1(b) of the CEQA Guidelines, each of these measures must be adopted exactly as written unless both of the following occur: (1) A public hearing is held on the proposed changes; (2) The hearing body adopts a written finding that the new measure is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.

MITIGATION MEASURE COMPLIANCE

Comply with the Mitigation Monitoring and Reporting Program (MMRP) for the 5204 Marione Dr WCF as follows:

1. It shall be the responsibility of the project applicant to reimburse the County for all expenses incurred in the implementation of the MMRP, including any necessary enforcement actions. The applicant shall pay an initial deposit of **\$5,400.00**. This fee includes administrative costs of **\$1,097.00**. Over the course of the project, the Division of Planning and Environmental Review will regularly conduct cost accounting and submit invoices to the applicant when the County monitoring costs exceed the initial deposit.
2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

LIST OF PREPARERS

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REFERENCES/CITATIONS

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APPENDIX A - PROVIDED UNDER SEPARATE COVER

Marione Drive Cell Tower Project Arborist Report

APPENDIX B – PROVIDED UNDER SEPARATE COVER

Structural Analysis Letter

APPENDIX C – PROVIDED UNDER SEPARATE COVER

Radio Frequency Emissions Compliance Report